

The governing body

Board structure and activities

Role of the governing body



Notes:

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Does the Fund have a Pension Committee (or equivalent) (PC) which fulfils the role of scheme manager / administering authority and is established in accordance with legislation within the appropriate constitution (or equivalent)?	Yes		
2	Has the Scheme Manager (i.e. the Administering Authority) established a Local Pension Board (PB) which meets the requirements of the LGPS regulations?	Yes		
3	Upon joining the PC (or equivalent) or PB, are members made aware and receive training about, the expected behaviours and standards of a member of PC / PB as set out in the Code (see paragraph 6 of this module)?	Yes		
4	Are the roles and responsibilities of members of the PC (or equivalent) and PB clearly set out in scheme documentation such as the Governance Policy?	Yes		

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Recruitment and appointment to the governing body

Notes:

- **Mostly applies / Partially good practice.** Whilst most of this module applies for Public Service Pension Schemes we note that it includes a paragraph (paragraph 3) which refers to good practice. Therefore we have shown the questions relating to this paragraph as being good practice only. Note that paragraph 6 doesn't apply for Public Service Pension Schemes.

- **When considering this module, you should also refer to the Pension Regulator's guidance on Equality, Diversity and Inclusion (on TPR website see Scheme management detailed guidance / Governing body / Equality, diversity and inclusion (EDI)). We recommend that further action is taken to review this guidance to ensure that you are following it.**

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have processes and policies in place for the appointment of members to the PC (or equivalent) and PB, covering the features set out in the Code (see paragraph 5 of this module)?	Partially		
2	Do you have processes in place to ensure recruitment practices of members to the PC (or equivalent) and PB are inclusive?	Partially		
3	Do you regularly review membership of the PC (or equivalent) and PB to ensure a diverse spread of members with varied technical skills and experience?	Yes		
4	Are members of PC (or equivalent) and PB asked to complete a skills gap analysis to ensure any gaps can be addressed over time?	Yes		
5	Does succession planning take place (to the extent it is able to)?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
6	Do you have a resignation and removal policy setting out who can remove a member of the PC (or equivalent) and PB and the circumstances and processes to follow?	Yes		
7	Do you have a process for ensuring that appropriate representation as required by the LGPS regulations / local government legislation is maintained?	Yes		

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Appointment and role of the chair



Notes:

- Mostly good practice. Our interpretation is that this module is good practice for Public Service Pension Schemes, other than paragraphs 4 and 5 which do not apply for Public Service Pension Schemes.

- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Is the process for the appointment of the Chair of the PC (or equivalent) and PB robust and clearly documented?	Yes		
2	Is there a process in place for the appointment of a new Chair of the PC (or equivalent) and PB upon resignation or removal?	Yes		
3	Are the Chairs of the PC (or equivalent) and PB made aware of, or provided training about, the skills and behaviours that they should demonstrate as set out in the Code (see paragraph 6 of this module)?	No		
4	Do you carry out regular analysis of the skills and behaviours of the Chair of the PC (or equivalent) and PB to ensure they are meeting the requirements in the Code (see paragraph 6 of this module)?	No		

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Board structure and activities

Meetings and decision-making



Notes:

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Does the PC (or equivalent) meet regularly (e.g. at least quarterly)?	Yes		
2	Does the PB meet regularly? (e.g. quarterly)?	Yes		
3	Do you ensure that the meeting and decision making arrangements for the PC (or equivalent) and PB adhere to requirements in the relevant local authority legislation, the LGPS regulations and the relevant areas of your Constitution?	Yes		
4	Are formal minutes prepared relating to all PC (or equivalent) and PB meetings which clearly document the date, time, place of meeting, those present, absentees, decisions taken, and decisions taken outside of meetings (including date decision was taken and those who participated in the decision)? (See the Public Service Record Keeping Regulations for PB requirements).	Yes		
5	When planning and running meetings, does the PC (or equivalent) and PB meet in accordance with the meeting processes, procedures and decision-making set out in the Code (see paragraph 6a to k of this module)?	Yes		
6	Are decisions at PC (or equivalent) and any sub-committee meetings made in accordance with LGPS legislation and their Terms of Reference?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
7	Are the matters considered at PB meetings in accordance with LGPS legislation and their Terms of Reference?	Yes		
8	Is there a clearly documented Scheme of Delegation which appropriately cover pension fund matters, including who can make decisions, and are records kept of all decisions (including background information and advice) made under these delegations?	Yes		
9	Are records of all declared conflicts of interests maintained?	Yes		
10	Are records of decisions retained for as long as they are needed?	Yes		
11	Does the PC (or equivalent) and PB have a clear process for determining what information should be made public and what information should not, in line with legal requirements including local authority legislation?	Yes		

The governing body

Board structure and activities

Remuneration and fee policy



Notes:

- Good practice
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Is there a written remuneration and fee policy in place for the PC (or equivalent), PB officers and any external bodies who effectively run the scheme?	Yes		
2	If Yes, is there a process in place for this to be reviewed at least every three years?	Yes		
3	Does the remuneration policy provide the rationale for the levels of remuneration (but noting that TPR have confirmed it does not have to set out levels of remuneration paid) and include measures taken to mitigate conflicts of interest?	Yes		
4	Does your remuneration and fee policy cover all areas set out in the Code (see paragraph 3 of this module)?	Yes		

The governing body



Knowledge and understanding requirements

Knowledge and understanding

Notes:

- Partially applies / Partially good practice. For Public Service Pension Schemes this module is a requirement for Pension Board members and good practice for scheme managers (or their delegates) (i.e. Pensions Committee (or equivalent)).
- This module forms part of an Effective System of Governance.
- When considering this module, you should also refer to the CIPFA Knowledge and Skills Code of Practice and Frameworks.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you maintain a list of items that all members of the PB should be familiar with which covers the key items set out in the Code (paragraphs 9 to 15 of this module) where relevant to the LGPS?	Yes		
2	If yes, is this list regularly reviewed (i.e. at least every three years or when new regulations / guidance are published)?	Yes		
3	Do you maintain a list of items that all members of the PC (or equivalent) (and any sub-committee) should be familiar with which covers the key items set out in the Code (paragraphs 9 to 15 of this module) where relevant to the LGPS?	Yes		
4	If yes, is this list regularly reviewed (i.e. at least every three years or when new regulations / guidance are published)?	Yes		
5	Are the key items set out in the Code (across paragraphs 9 to 15 of this module where relevant to the LGPS) covered in your training plan, including induction training, and Knowledge and Skills Policy?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
6	Do you have a Knowledge and Skills Policy (or equivalent) that's regularly updated (i.e. every 3 years) which covers members of the PC (or equivalent), PB and Fund officers covering the expectations of the Code and in accordance with the CIPFA Knowledge and Skills Frameworks?	Yes		

The governing body



Knowledge and understanding requirements

Governance of knowledge and understanding

Notes:

- Partially applies / Partially good practice. For Public Service Pension Schemes this module is a requirement for Pension Board members. We note that there is no reference in this module to scheme managers (or their delegates) in relation to Public Service Pension Schemes. However, given the CIPFA Knowledge and Skills Code of Practice and Frameworks referred to below we would suggest that it is good practice to also apply the principles set out in this module to the Pension Committee (or equivalent). We have therefore included some good practice questions in this module shown in orange.

- This module forms part of an Effective System of Governance.

- When considering this module, you should also refer to the CIPFA Knowledge and Skills Code of Practice and Frameworks.

Question ID	Question	Answer	Current Score	Previous Score
1	Does the PB have a balance of skills and experience, and is it able to demonstrate and apply these skills and experience?	Yes		
2	Are new members of PB given appropriate induction training to ensure they can demonstrate the basic level of required knowledge within six months of their appointment?	Yes		
3	Do you carry out a regular review (i.e. annually) of any gaps in knowledge and skills within the PB to ensure appropriate training is provided to address these gaps?	Yes		
4	Do you maintain training and development plans for the PB to ensure knowledge is kept up to date, covering both individual and collective knowledge?	Partially		

Question ID	Question	Answer	Current Score	Previous Score
5	Are all PB members made aware of the required investment in time for learning and development, in addition to other duties?	Yes		
6	Do you consider and provide a range of ways for PB members to acquire knowledge?	Yes		
7	Do you retain details of training undertaken (both internally and externally) by individual members of PB, including setting out steps taken to address any gaps and meet legal requirements?	Yes		
8	Does the PC (or equivalent) have a balance of skills and experience, and is it able to demonstrate and apply these skills and experience?	Yes		
9	Are new members of PC (or equivalent) given appropriate induction training to ensure they can demonstrate the basic level of required knowledge within six months of their appointment?	Yes		
10	Do you carry out a regular review (i.e. annually) of any gaps in knowledge and skills within the PC (or equivalent) to ensure appropriate training is provided to address these gaps?	Yes		
11	Do you maintain training and development plans for the PC (or equivalent) to ensure knowledge is kept up to date, covering both individual and collective knowledge?	Partially		
12	Are all PC (or equivalent) members made aware of the required investment in time for learning and development, in addition to other duties?	Yes		
13	Do you consider and provide a range of ways for PC (or equivalent) members to acquire knowledge?	Yes		
14	Do you retain details of training undertaken (both internally and externally) by individual members of PC (or equivalent), including setting out steps taken to address any gaps and meet legal requirements?	Yes		

The governing body

Advisers and service providers

Managing advisers and service providers



Notes:

- Good practice
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have agreed and documented policies for making appointments to the Fund?	Yes		
2	Is the policy for selecting advisers and service providers approved by the PC (or equivalent) and reviewed at least every three years?	Yes		
3	Do you ensure sufficient resources and time is allocated to procurement activity?	Yes		
4	Are you familiar with the terms & conditions of contracts with service providers, including any national frameworks where relevant, and understand the scope of responsibilities performed by service providers and advisers?	Yes		
5	Do you assess service providers, including undertaking due diligence, as part of the appointment process?	Yes		
6	Do you clearly set out the roles and responsibilities of service providers and advisers as part of the appointment process?	Yes		
7	Do you have agreed delegations and procedures for referral (i.e. asking for work to be carried out) with service providers?	Partially		

Question ID	Question	Answer	Current Score	Previous Score
8	Is there an agreed process in place for ongoing management of advisers, recording decisions taken, as well as escalation points?	Partially		
9	Are there policies and processes in place for identifying and managing conflicts of interest?	Yes		
10	Do you consider and understand data protection requirements for any information shared with or handled by your service providers?	Yes		
11	Are you aware of the obligations, professional conduct rule and whistleblowing requirements placed on some advisors?	Yes		
12	Do you ensure that service providers are able to demonstrate that they have adequate internal controls relating to the services they provide?	Yes		
13	Do you regularly assess and record performance of service providers against key performance indicators and service level agreements, and have in place a process for ensuring improvements are made where poor service is identified?	Partially		
14	Do you carry out a market review for all relevant service providers?	Yes		
15	Do you work with service providers to understand expected scheme or legal changes and ensure they are able to provide the necessary resources to deal with the changes?	Yes		
16	Do you have business continuity plans in place to enable continuous and consistent provision of services in the event of a change in service provider or provider failure?	Partially		
17	When considering replacing a service provider, do you consider the interests of the scheme members?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
18	When replacing a service provider, do you understand the impact of the terms and conditions of contracts in place, including fees or penalties and procedures for releasing relevant information?	Yes		
19	When replacing service providers and advisors, do you plan transition effectively, setting out the risks, key steps, actions, decisions, owners and timescales, including how costs will be met and how risks will be mitigated?	Yes		

The governing body



Risk management

Identifying, evaluating and recording risks

Notes:

- Applies
- This module forms part of an Effective System of Governance.
- When considering this module, you should also refer to the CIPFA Managing Risk in the LGPS guidance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a Risk Management Policy approved by the PC (or equivalent)?	Yes		
2	If Yes, is your policy reviewed at least every 3 years and is it currently up to date, accurate, relevant and in accordance with LGPS Regulations?	Yes		
3	Do you have a risk register to record all risks identified and action taken?	Yes		
4	Do you have an agreed process for regularly considering and identifying risks which is integrated into the day to day management of the Fund / scheme and which includes reviewing your risk register at least quarterly?	Yes		
5	Do you consider all of the following types of risks alongside appropriate risk mitigation techniques:			
5 a	▪ scheme investments, including asset-liability management	Yes		
5 b	▪ operation resilience, including for service providers	Yes		
5 c	▪ insurances, compensation funds, and other risk-mitigation techniques	Yes		
5 d	▪ environmental, social, and governance risks	Yes		
5 e	▪ scheme funding and covenant strength	Yes		
5 f	▪ the risk of fraud	Yes		
5 g	▪ failure to comply with the law and / or scheme rules	Yes		

Question ID	Question	Answer	Current Score	Previous Score
5 h	▪ poor record-keeping, poor administration, and IT and database failures	Yes		
5 i	▪ cyber security risks	Yes		
5 j	▪ governance and decision making, or existing controls are not operating to the standard required by pensions legislation	Yes		
5 k	▪ actual or potential conflicts of interest	Yes		
6	Does the PC (or equivalent) and PB do the following at each meeting:			
6 a	▪ identify and evaluate risks	Yes		
6 b	▪ review internal controls and risk management	Yes		
7	Do your processes for evaluating risks meet the expectations set out in the Code (see paragraph 7 in this module)?	Yes		
8	Do your processes for recording and updating risk records meet the expectations set out in the Code (see paragraph 8 in this module)?	Yes		
9	Do you have clear ownership of who monitors risks and addresses risks (both within the Fund and with third parties)?	Yes		
10	Do you get information from relevant parties (e.g. investment managers, administrator) at least quarterly to allow you to update the Risk Register?	Yes		
11	In allocating roles and responsibilities, do you:			
11 a	▪ have processes to monitor risk and issues between meetings (particularly if action is the responsibility of third-party)?	Yes		
11 b	▪ receive information from relevant parties to update the risk register (quarterly)?	Yes		
11 c	▪ recognise when professional advice is required?	Yes		

The governing body

Risk management

Internal controls



Notes:

- Applies
- This module forms part of an Effective System of Governance.
- When considering this module, you should also refer to the CIPFA Managing Risk in the LGPS guidance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you maintain a risk management framework that clearly identifies the internal controls in place or required for mitigating risks?	Yes		
2	When developing your internal controls, do you ensure there is appropriate separation of duties, and that they include the processes for escalation and decision making?	Yes		
3	Do the internal controls ensure you administer and manage the Fund / scheme in accordance with the requirements of the law and relevant regulations?	Partially		
4	Are your internal controls all documented?	Partially		
5	Do you have a system to review internal controls in place regularly (e.g. at least annually, upon substantial changes to the Fund / scheme or if a control is not working to the standard required by the law)?	Yes		
6	When designing internal controls have you considered the expectations set out in the Code (see paragraph 17 in this module)?	Yes		

The governing body

Risk management

Assurance reports on internal controls



Notes:
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Do you carry out an annual statutory audit (external audit) as part of the preparation of your Annual Report and Accounts?	Yes		
2	Do you engage with your internal auditor to suggest specific areas of concern that could be covered by an audit?	Yes		
3	Do you receive and consider assurance reporting from relevant parties (e.g. by service providers including investment managers and custodians), if they are available?	Yes		

The governing body

Risk management

Scheme continuity planning



Notes:

- Good practice. However, we note that it is a legal requirement for Public Service Pension Schemes to establish and operate internal controls and we would expect that scheme continuity planning would be included within this.

- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a Fund-specific Business Continuity Plan (BCP)?	Yes	Green	Green
2	Does the BCP include data and general administration?	No	Red	Green
3	Are there clear roles and responsibilities in your BCP?	N/A	Green	Green
4	Have any roles and responsibilities for service providers been agreed with them?	N/A	Green	Green
5	Have you had assurance that advisers and service providers to the Fund have their own BCP in place?	Partially	Yellow	Green
6	If you answered yes to Q5 did you review the information received from suppliers / advisers?	N/A	Green	Green
7	Do you review your BCP and associated documents regularly (for example, annually) or on a change in system or process if sooner?	N/A	Green	Green

Question ID	Question	Answer	Current Score	Previous Score
8	Does your Business Continuity approach ensure key member processes are prioritised?	N/A		
9	Does your BCP ensure continued access to resources, service and communications with key parties?	N/A		
10	Have you considered timeframes to bring new resources on board in a business continuity situation?	No		
11	Do you have contingency plans to address any under resourcing issues?	No		
12	Do you undertake Annual Business Planning to identify additional resource requirements each year for projects / non business as usual work?	Yes		

The governing body

Risk management

Conflicts of interest



Notes:

- Partially applies / Partially good practice. Our interpretation is that the internal control elements of this module apply to Public Service Pension Schemes (paragraph 3a which then refers to paragraphs 6 to 8), along with the requirements for Pension Boards (paragraphs 22 to 24). We have highlighted these paragraphs bold. The remaining paragraphs are good practice for Public Service Pension Schemes (as referenced in paragraph 3b). We have highlighted these paragraphs orange.

- This module forms part of an Effective System of Governance.

- The internal control requirements under section 249B of the Pensions Act 2004 are highlighted in the Code in relation to this module. If any elements are highlighted as good practice only, you should still ensure that you have the appropriate internal controls in place.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a Fund-specific conflicts of interest policy which is published covering persons involved in the governance and management of the Fund (including PC (or equivalent), PB and officers)?	Yes		
2	If yes, is this policy regularly reviewed (e.g. every 3 years) and is it currently up to date, accurate, relevant and in accordance with LGPS Regulations?	Yes		
3	Is training on the requirements of this policy provided to PC (or equivalent), PB, officers and shared with advisers?	Yes		
4	Does the PC (or equivalent) and PB consider potential and actual conflicts at every meeting, including in relation to specific agenda items and record these considerations?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
5	Do you maintain a register of interests?	Yes		
6	Do you have a process to ensure that all new PC (or equivalent), PB members and advisers make a declaration of conflicts of interest on appointment?	Yes		
7	Have you ensured that your advisers have their own policy for managing potential conflicts which may arise?	Yes		
8	Does your Fund-specific conflicts of interest policy reflect relevant expectations of the Code (see paragraphs 9 to 19 of this module)?	Yes		
9	Do you have a process to ensure that a prospective member of the PB does not have a conflict of interest?	Yes		
10	Do you have processes to ensure that you remain satisfied that none of the members of the PB have a conflict of interest?	Yes		
11	Do you ensure that the register of interests and other relevant documents are circulated to the PB for ongoing review and are published?	Partially		

Funding and investment



Investment

Investment governance

Notes:

- Good practice for Local Government Pension Schemes. (This module doesn't apply for any unfunded Public Service Pension Schemes).
- This module forms part of an Effective System of Governance.
- Within this module (and the other modules within the Funding and investment section) there are references to the statement of investment principles (SIP). For LGPS funds a broadly equivalent document is the Investment Strategy Statement (ISS). We have therefore included questions in relation to the ISS where appropriate. We note that although the questions in this module are good practice only it is a requirement to have an ISS as set out in the LGPS Investment Regulations 2016.

Question ID	Question	Answer	Current Score	Previous Score
1	Can the PC (or equivalent) demonstrate a good working knowledge of investment matters including their powers and duties relating to their Fund (i.e. is this sufficient to evaluate and challenge the advice received from advisers and service providers)?	Yes		
2	Do you have an Investment Strategy Statement (ISS) approved by the PC (or equivalent) in accordance with the LGPS regulations? (Note that although this module is good practice for LGPS it is a requirement of the LGPS Investment Regulations 2016 that Funds must publish an ISS).	Yes		
3	Is the ISS regularly reviewed (at least every 3 years) and is it currently up to date, accurate, relevant and in accordance with the regulations and guidance? (Note this is also a requirement of the LGPS Investment Regulations 2016).	Yes		
4	Do you clearly document the objectives, roles, responsibilities and reporting relationships of all parties involved in making investment decisions, including where investment decisions are delegated?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
5	Do you ensure that those making investment decisions have the necessary skills, knowledge, information and resources?	Yes	Green	
6	Do you obtain advice and other inputs required from a suitably qualified person to properly govern the scheme's investments?	Yes	Green	
7	Is the governance structure relating to the assessment of investment risks reviewed regularly and appropriate for your Fund?	Partially	Yellow	Grey
8	Does the PC (or equivalent) delegate investment decisions where appropriate for their Fund's circumstances and level of complexity (e.g. to an investment subcommittee or a qualified investment manager)?	Yes	Green	
9	Are there clear strategic objectives set for appointed investment advisers?	Yes	Green	
10	Does your ISS consider potential long-term effects on scheme investments?	Yes	Green	
11	Do you regularly monitor the performance of your investment managers, including the pool and advisers, including carrying out a formal review at least every 3 years?	Yes	Green	
12	Does the PC (or equivalent) consider the performance of investments quarterly, against the benchmark objectives?	Yes	Green	
13	Do you ensure that your Additional Voluntary Contribution (AVC) arrangements meet the requirements of the Code in relation to Defined Contribution elements (see list in paragraph 10 of this module)?	Partially	Yellow	
14	Do you have a policy for ensuring investment decisions consider the form and structure of liabilities, the range of employers in the Fund, the employer risk / covenant of those employers, and your Fund's access to cash as required?	Yes	Green	

Funding and investment



Investment

Investment monitoring

Notes:

- Good practice for Local Government Pension Schemes. (This module doesn't apply for any unfunded Public Service Pension Schemes).
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do those responsible for your investment governance carry it out with the best interests of scheme members and their beneficiaries in mind?	Yes		
2	Do you have a process to review and negotiate contractual arrangements with investment managers and advisers (either themselves or via delegation to your LGPS pool)?	Yes		
3	Do you regularly review the performance of the investment managers, the pool, and advisers (e.g. against the objectives set for them, their delegated responsibilities and any legal obligations)?	Yes		
4	Do you have procedures to monitor investment performance regularly, against benchmarks and stated short and long-term investment objectives?	Yes		
5	When monitoring investment performance, are investment returns before and after fees considered, and does the process consider whether fees and costs are justified?	Partially		

Question ID	Question	Answer	Current Score	Previous Score
6	Do you consider whether and how to report to interested parties on investment matters, such as scheme members and participating employers?	Yes		
7	Do you ensure that monitoring information is prepared at least quarterly?	Yes		
8	Do you ensure that the analysis of monitoring information includes a stress test, scenario test, or other risk assessment information, to assess the impact of changing circumstances on scheme assets and if relevant, funding level?	No		
9	Do you monitor the level of investment risk run to deliver the performance and how this compares with the investment manager's risk targets?	Yes		
10	Do you consider and have processes in place to ensure compliance with environmental, social and governance (ESG) matters and shareholder engagement?	Yes		
11	Do you ensure that controls are in place to alert you to potential financial risks relating to your investment managers?	Yes		
12	Do you regularly assess the effectiveness of processes, ensuring proper review and monitoring of investments and making improvements, as appropriate?	Yes		
13	Have you set clear expectations for investment managers (including your LGPS pool) in relation to monitoring of information and investment risk covering the factors set out in this module?	Yes		

Funding and investment



Investment

Stewardship

Notes:

- Partially good practice. Our reading of this module is that it is partially good practice for Public Service Pension Schemes. See paragraphs 12 and 13 which are shown in bold in the extract below. Regardless, the LGPS Investment Regulations 2016 do state that the authority's investment strategy must include "the authority's policy on how social, environmental and corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments; and the authority's policy on the exercise of the rights (including voting rights) attaching to investments."

- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Does your ISS include your policy on the exercise of the rights (including voting rights) attached to investments and consider your approach to voting and engagement on relevant matters, including on ESG?	Yes		
2	During the investment manager selection do you obtain the investment managers' stewardship policies and are they regularly reviewed?	Yes		
3	Are you (or your pool) a Signatory to the Financial Reporting Council's UK Stewardship Code?	Yes		
4	Do you engage with investee companies and collaborative industry initiatives directly or indirectly, with a view to mitigating risks to long-term investment goals?	Yes		
5	Do you cooperate with other institutional investors on ESG issues?	Yes		

Funding and investment



Investment

Climate change

Notes:

- Partially applies / Partially good practice. Our reading of this module is that it partially applies and is partially good practice for Public Service Pension Schemes . Paragraph 7 applies and paragraphs 4, 5, 6, 8 and 9 are good practice (shown in bold and orange below respectively).

- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you assess the risks and opportunities associated with climate change as part of your risk management?	Partially		
2	Do you engage with your advisers and asset managers about how they incorporate climate risk and opportunities into their investment advice to you, and understand how climate risk is considered in investment portfolios?	Yes		
3	Do you consider the possible short, medium and long-term effects of climate change on your objectives and operations?	No		
4	Do you document processes for identifying and assessing climate-related risks and opportunities and integrate these into your risk management and governance arrangements?	No		
5	Do you ensure you oversee, assess, and manage climate-related risks and opportunities relating to the Fund?	Partially		

Administration



Scheme administration

Planning and maintaining administration

Notes:
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Is induction training on administration provided to all PB and PC (or equivalent) members within 6 months of appointment?	Yes		
2	Is update / refresher training on administration (including hot topics) provided to all PB and PC (or equivalent) members?	Yes		
3	Have you documented the administration responsibilities and tasks, including who carries out each of these within the teams (including if a third party / shared service)?	Partially		
4	Does PB / PC (or equivalent) training include a high level overview of responsibilities / tasks in relation to administration, including who performs them (i.e. third party administrator / shared service or who in the in-house team)?	Yes		
5	If administration is outsourced to a third-party have the following aspects been considered as part of the tender process:			
5 a	▪ Appropriate advice and assistance to negotiate contractual terms?	N/A		
5 b	▪ Consideration of quality and value for members when selecting the administrator?	N/A		
6	Is administration considered at all (or most) meetings of the PB and PC (or equivalent)?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
7	Is administration and record-keeping included in your risk register?	Yes		
8	Do you have a Pensions Administration Strategy in place?	Yes		
9	Does your Business Plan outline the key administration tasks / areas of focus for the next 3 years?	Yes		
10	Are administration processes monitored regularly to ensure they are being carried out correctly and improvements made, where required (i.e. periodic checks take place to ensure proper checking and peer review of administration tasks across all processes to ensure compliance with legislation and Fund requirements)?	Partially		
11	Does the administration service (whether in-house or outsourced) provide regular reports (i.e. KPI reports, caseload reports, progress against business plan etc) to senior officers (e.g. at least monthly) which enables them to monitor the team / administrator's performance and challenge the information received?	Partially		
12	If administration is outsourced to a third-party is their performance regularly monitored against contractual (including overriding legal) requirements, and are issues with performance used to drive improvements?	N/A		
13	Does your Business Plan include the date any third party administration / shared service contract is due to cease, with appropriate lead in time to review the approach?	N/A		
14	Are all administration processes documented in a way that would enable continuous and consistent service during an absence or change in personnel or administration provider?	Yes		
15	Is there a robust business continuity plan in place for the administration service (either in-house or outsourced) which is reviewed annually and regularly tested?	No		

Question ID	Question	Answer	Current Score	Previous Score
16	Are there clearly documented administration procedures which are regularly reviewed and updated when required due to changes in the scheme rules / internal processes?	Partially		

Administration

Information handling

Financial transactions



Notes:

- Applies
- This module forms part of an Effective System of Governance.
- This module applies to all financial transactions, including benefits, contributions and investments and you should therefore ensure all financial transactions are considered in answering these questions.

Question ID	Question	Answer	Current Score	Previous Score
1	Are PB and PC (or equivalent) members aware of the general procedures and controls used to ensure financial transactions are processed promptly and accurately?	Yes		
2	Financial transactions reviews:			
2 a	▪ Do you review all processes and systems relating to financial transactions annually?	Yes		
2 b	▪ Does that review lead to improvements in the processes relating to financial transactions, if required?	Yes		
3	Is there a clear and effective authorisation process in place for financial transactions?	Yes		
4	Are processes relating to financial transactions segregated and managed at appropriate levels to ensure suitable authorisation of transactions?	Yes		
5	Are all payments to and from the Fund made electronically with cheques only used in exceptional cases?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
6	Are there clear service standards and Service Level Agreements (SLAs) in relation to financial transactions in place with employers and other stakeholders, and in relation to internal Fund transactions?	Yes		
7	Do you undertake regular reviews of performance against service level agreements for financial transactions and assess if it is satisfactory?	Yes		
8	Do you have clear processes in place around communications with employers to ensure information relating to financial transactions flows appropriately?	Yes		
9	Do you undertake regular reviews of scheme data to ensure it is accurate and complete so that financial transactions can be processed accurately?	Partially		

Administration

Information handling

Transfers out



Notes:

- **Mostly applies.** We note that paragraph 9 in this module does not apply to Public Service Pension Schemes.
- **When considering this module, you should also refer to the Pension Regulator's guidance on Dealing with transfer requests (on TPR website see Scheme management detailed guidance / Administration / Dealing with transfer requests).** You should also have regard to industry good practice set out in the Pension Scams Industry Group (PSIG) Code of Good Practice.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have clear procedures to deal with transfer out requests in a timely manner?	Yes	Green	Red
2	Do you:	Grey	Green	Yellow
2 a	▪ monitor whether you provide CETVs within the legal timeframe?	Yes	Green	Red
2 b	▪ provide CETVs within the legal timeframe?	Yes	Green	Yellow
2 c	▪ complete transfer out payments within the legal timeframe?	Yes	Green	Yellow
3	Do you undertake the necessary checks before transferring member benefits to another arrangement, including:	Grey	Green	Yellow
3 a	▪ check the receiving scheme is willing and able to accept the transfer and the receiving scheme is a scheme to which a transfer can legally be made?	Yes	Green	Green

Question ID	Question	Answer	Current Score	Previous Score
3 b	<ul style="list-style-type: none"> ▪ check one of the conditions to transfer is met to grant a statutory right to transfer and if neither condition is met and the receiving scheme may be an illegitimate arrangement refuse the transfer and inform the member and report it to Action Fraud? 	Yes		
4	When a member aged over 50 with an AVC arrangement contacts you enquiring about transferring their AVC arrangement out to another Defined Contribution scheme in order to access flexible benefits do you refer them to Pension Wise?	Yes		
5	Do you undertake the necessary checks as outlined in the Code (as per paragraphs 10 to 12 of this module) before transferring member benefits above £30,000 to a Defined Contribution arrangement, including that independent advice has been sought from a provider you have verified and you have received written confirmation of the advice?	Yes		
6	Are all records relating to the transfer (this includes all documentation as well as file notes from phone calls / workflow tasks etc) retained for as long as is relevant and in line with data protection principles?	Yes		

Administration

Information handling

Record keeping



Notes:

- Partially applies / Partially good practice. Paragraphs 7, 9 and 11 of this module are shown as good practice. Therefore we have shown the questions relating to these paragraphs as being good practice only.
- This module forms part of an Effective System of Governance.
- The internal control requirements under section 249B of the Pensions Act 2004 are highlighted in the Code in relation to this module. If any elements are highlighted as good practice only, you should still ensure that you have the appropriate internal controls in place.
- This module applies to record keeping across various areas including member records, transactions and meetings and you should therefore ensure all record keeping is considered in answering these questions. You should also consider the Public Service Pensions (Record Keeping and Miscellaneous Amendment Regulations 2014).

Question ID	Question	Answer	Current Score	Previous Score
1	Overall do you (and any third party administrator / shared service) record the information required as listed in the Record Keeping Regulations for:			
1 a	▪ Members and beneficiaries' data?	Yes – Evidence provided		
1 b	▪ Transactions?	Yes – Evidence provided		

Question ID	Question	Answer	Current Score	Previous Score
1 c	▪ Pension Board meetings and decisions?	Yes – Evidence provided		
2	Do you (and any third-party administrator / shared service) have processes in place to maintain accurate and up-to-date records covering:			
2 a	▪ Members and beneficiaries' data?	Yes		
2 b	▪ Transactions?	Yes		
2 c	▪ Pension board meetings and decisions?	Yes		
3	Do you (and any third-party administrator / shared service) retain records for as long as the information is relevant and in line with data protection legislation?	Partially		
4	Do you (and any third-party administrator / shared service) store data securely and for legitimate purposes only on administration systems?	Partially		
5	Are all member and benefit records held electronically on a dedicated administration system?	Yes		
6	Are records kept of changes to Fund governing documents (e.g. strategies and policies), including records of how the changes have been applied to your members?	Yes		
7	Do you (and any third-party administrator / shared service):			
7 a	▪ Hold all basic member data defined as common data?	Yes		
7 b	▪ Identify, record and validate data defined as scheme specific data?	Partially		

Question ID	Question	Answer	Current Score	Previous Score
8	Do you continually consider technological developments to improve administration and record keeping?	Yes		
9	Do you have processes in place to record member benefits, identifiers, contributions, investments and disinvestments, member decisions, payments, transfers and accurately carry out benefit calculations?	Yes		
10	Do you issue Annual Benefit Statements as required by law, which are accurate, include both accrued and projected benefit amounts and issued in the timescales required? (For LGPS this is by 31 August each year and must be sent to active, deferred, deferred pensioner and pension credit members).	Yes		
11	Do you carry out reconciliations of data, transactions and investments?	Yes		
12	Are there reporting mechanisms in place to identify members approaching retirement and other scheme specific events?	Yes		
13	Do you use software to allow financial and other transactions to be carried out automatically and securely (e.g. monthly scheme member data uploads from employers)?	Yes		
14	Do you regularly generate reports relating to, contributions, membership movements, core data and scheme specific data?	Yes		
15	Do you have processes in place to enable employers to provide timely and accurate data?	Yes		
16	Do you have processes and policies in place to reconcile scheme data with employer data?	Yes		
17	Do you have processes in place to identify where an employer fails to meet their legal duties relating to the scheme, and an escalation process in place to manage that situation?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
18	Do employers understand the main events that must be reported and do you provide ongoing employer information such as employer guides and training to assist employers understand their responsibilities in communicating member information to the scheme?	Yes		

Administration

Information handling

Data monitoring and improvement



Notes:

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you (and any third party administrator / shared service) have processes in place to monitor scheme data in line with the requirements of the Code (paragraphs 5a to 5h in this module)?	Partially		
2	Do you assess the need for a data review exercise at least annually (including in relation to any third party administrator / shared service), and identify where any additional data review is needed due to scheme or administrator changes?	Yes		
3	Do you (and any third party administrator / shared service) assess the accuracy and completeness of common data and scheme specific data?	Yes		
4	Do you keep a record of data reviews undertaken and their findings (including by any third party administrator / shared service)?	Partially		
5	Is a data improvement plan in place which is being monitored, actions progressed, and with defined target dates?	No		
6	Have you clearly documented decisions / policies related to areas where data cannot be corrected?	No		

Question ID	Question	Answer	Current Score	Previous Score
7	Do your member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	Yes		
8	Do you have processes in place to address any breaches of the data protection legislation?	Yes		
9	Are all administering authority staff trained in understanding the requirements of data protection law?	Yes		

Administration



IT

Maintenance of IT systems

Notes:

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you record evidence of how changes are planned and executed within your IT systems?	Yes		
2	Is scheme and member data backed up regularly?	Yes		
3	Are disaster recovery plans in place for IT system failures and are these regularly tested?	Yes		
4	Do you have a written policy / policies for maintaining, upgrading and replacing hardware and software?	Yes		
5	Are you satisfied that adequate IT and personnel resources are available with appropriate functionality / skills?	Yes		
6	Are you able to demonstrate that your IT systems can meet current and anticipated system requirements, including having a schedule for the software to be replaced or updated when legislation changes occur (e.g. for regular changes to tax thresholds / revaluation etc)?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
7	Are you able to demonstrate that you have plans in place to manage expected and potential future upgrades within the administration system?	Yes		
8	Do you ensure that your service providers (note - not just IT service providers) meet TPR's standards for maintaining their own IT systems as set out in paragraph 5 of this module?	Yes		

Administration



IT

Cyber controls

Notes:

- **Mostly applies / Partially good practice.** Our interpretation is that most of this module applies to Public Service Pension Schemes. Paragraphs 3 and 4 of this module refer to internal controls which is a legal requirement for Public Service Pension Schemes. Therefore all questions within this module are shown as applying.

- The internal control requirements under section 249B of the Pensions Act 2004 are highlighted in the Code in relation to this module. If any elements are highlighted as good practice only, you should still ensure that you have the appropriate internal controls in place.

- When considering this module, you should also refer to the Pension Regulator’s guidance on Cyber security principles for pension schemes (on TPR website see Scheme management detailed guidance / Administration / Cyber security principles). We recommend that further action is taken to review this guidance to ensure that you are following it.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a Fund specific Cyber Policy / strategy covering the recommended areas set out in the Code? (paragraphs 8 and 9 of this module)?	Partially		
2	Can the PB and PC (or equivalent) demonstrate good knowledge and understanding of cyber risk and how this relates to the Fund?	Yes		
3	Do you understand the need for confidentiality, integrity and availability of the systems and services for processing personal data?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
4	Do you have a Fund specific Cyber Incident Response Plan which contains: a) clearly defined roles and responsibilities to identify cyber risk and breaches; and b) how to respond to cyber incidents?	Yes		
5	Do you include cyber risks on the Fund's risk register and is this regularly reviewed and discussed at PC (or equivalent) meetings?	Yes		
6	Do you have access to specialist skills and expertise to assist you with understanding and managing cyber risk?	Yes		
7	Do you (or any third party administrator / shared service) have appropriate system controls in place which are up to date (e.g. firewalls, anti-virus and anti-malware products)?	Yes		
8	Have you documented details such as use of devices and working remotely (i.e. Cyber Hygiene guidelines)?	Partially		
9	Do you receive appropriate assurance of service providers' internal cyber controls?	Partially		

Administration

Contributions

Receiving contributions



Notes:

- Partially applies. Our reading of this module is that it partially applies for Public Service Pension Schemes. Paragraphs 1, 2 and 4 apply whilst paragraphs 5 and 6 do not apply (as Public Service Pension Schemes are exempt as set out in paragraph 4).

- This module forms part of an Effective System of Governance.

- Refer to Local Government Pension Scheme Regulations 2013, particularly regulations 67, 68 and 71 for requirements relating to payments of contributions.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have in place a Rates and Adjustments Certificate, and do you notify all employers in writing of (a) their required contribution rates in accordance with that Certificate and (b) scheme member contribution rates as updated annually in accordance with the scheme regulations?	Yes		
2	Do you have systems in place to monitor the payment of contributions from employers, and quickly identify and pursue any missing payments, and do you maintain records of missed contributions and all recovery activities?	Yes		

Administration

Contributions

Monitoring contributions



Notes:

- Applies
- This module forms part of an Effective System of Governance.
- Refer to Local Government Pension Scheme Regulations 2013, particularly regulations 67, 68 and 71 for requirements relating to payments of contributions.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a contributions' monitoring record to determine whether the correct rate of employer contributions are paid, paid on time and in full, and does it include the information required by paragraph 7 in this module?	Yes		
2	Do you keep records of any employer contributions due to the Fund that have been written off, including copies of decisions / authorisation in relation to these?	Yes		
3	If administration is outsourced to a third-party who carries out monitoring of contributions for you, do you receive regular information on the payment of contributions to the Fund including when employers have failed to meet deadlines, are paying incorrect amounts or are not providing the required information?	N/A		
4	Do you record and retain information on transactions that supports your monitoring responsibilities, including records of all contributions received in relation to each scheme member and payments of pensions and other benefits?	Yes		
5	Do you carry out regular (at least annual) spot checks on the amount of scheme member contributions being deducted by employers?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
6	Do you have internal controls in place to reconcile all contribution payments notified by an employer against the amounts actually received, and all scheme member contributions notified by an employer against the amounts uploaded to individual scheme member records?	Yes		
7	Do you have processes in place to check on an ongoing basis that employers are providing sufficient information to allow you to monitor both scheme member and employer contributions and that the information provided is in accordance with the LGPS regulation 69(3) and the Code (paragraphs 11a, b and c in this module)?	Yes		

Administration

Contributions

Resolving overdue contributions



Notes:

- Applies
- Refer to Local Government Pension Scheme Regulations 2013, particularly regulations 67, 68 and 71 for requirements relating to payments of contributions.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a documented process and systems in place for dealing with overdue payments and rectifying administration errors, and do they cover the steps outlined in the Code (paragraphs 4a to 4i of this module)?	Partially		
2	Where a payment failure has occurred, do you maintain a record of your investigation, all decisions made and by whom, and communications with the relevant employer?	Yes		
3	Do you periodically undertake a review of processes to detect situations of deliberate underpayment or fraudulent behaviour of an employer?	No		
4	Does your process include steps to identify whether a payment failure is of material significance in order to determine whether it should be reported to TPR?	No		

Communications and disclosure



Information to members

General principles for member communications

Notes:

- Applies
- This module forms part of an Effective System of Governance.
- When considering this module, you should also refer to the Pension Regulator's guidance on Equality, Diversity and Inclusion (on TPR website see Scheme management detailed guidance / Governing body / Equality, diversity and inclusion (EDI)).

Question ID	Question	Answer	Current Score	Previous Score
1	Do you:			
1 a	▪ understand the legal requirements around the information you must provide to members and the required timescales as outlined in The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and other legislation?	Yes		
1 b	▪ monitor whether you meet the legal timescales as outlined in The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and other legislation?	No		
1 c	▪ meet these legal requirements in relation to the information being provided within the required timescales?	Partially		
2	Do you follow the principles of plain English in your communications and ensure that all communications sent to members are accurate, clear, concise and relevant?	No		

Question ID	Question	Answer	Current Score	Previous Score
3	Do you consider member engagement, equality, diversity and inclusion when developing member communications to ensure they are accessible for all, including use of accessible on-line content, audio, alternative languages etc?	Partially		
4	Do you regularly review member communications for accuracy and good practice, taking account of member feedback?	Yes		
5	Do you consider and where appropriate, maximise the use of technology in assisting with communication to members, for example the use of a member self-service portal for the membership?	Yes		
6	Do you regularly provide additional information and explanation to members to help them make informed decisions?	Yes		
7	Do you regularly communicate the benefits of the scheme to the membership?	Yes		
8	Do you have a Communications Policy which has been approved by your PC (or equivalent)?	Yes		
9	If yes, do you review your Communications Policy regularly (at least every three years), and is it currently up to date, accurate, relevant and in accordance with LGPS Regulations?	Yes		

Communications and disclosure



Information to members

Benefit information statements (PSPS)

Notes:
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Do you issue all Annual Benefit Statements (covering active members, deferred members, deferred pensioner members and pension credit members) within the required legal timescales (by 31st August)?	Yes		
2	Does the statement for active members include a description of the benefits earned by the member during their pensionable service?	Yes		
3	Do the statements comply with HM Treasury directions and LGPS regulations in terms of what information is included and the way it must be provided to members?	Yes		
4	Are annual benefit statements provided to all members with AVCs within the required timescales?	Partially		
5	Do the annual benefit statements provided to members with AVCs meet the legal requirements in relation to the information provided?	No		

Communications and disclosure



Information to members

Retirement risk warnings and guidance

Notes:
- Applies. This module applies in relation to Additional Voluntary Contribution (AVC) arrangements.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you provide information about Pension Wise with application forms or any other methods that allow members to take payment of their AVC plan, where this is required by legislation?	Yes		
2	Do you check that members have completed and signed a declaration form confirming they have taken guidance or opted out of guidance before processing a member's AVC choices upon drawing benefits, where this is required by legislation?	Yes		

Communications and disclosure



Information to members

Notification of right to cash transfer sum or contribution refund

Notes:

- **Mostly applies.** We note that paragraph 8 in this module does not apply to Public Service Pension Schemes.
- **When considering the information in this module, you should also be mindful of other legal timescales including 27A(1)(a) of The Occupational Pension Schemes (Preservation of Benefit) Regulations 1991 requiring notification of rights and options available on leaving within 2 months of being notified pensionable service has terminated.**

Question ID	Question	Answer	Current Score	Previous Score
1	Where a member has a right to a cash transfer sum (i.e. cash equivalent transfer value) or a contribution refund do you provide written notice to the member containing the information required to explain their rights, within three months of the date the member leaves the scheme, and advise members where it is likely to take more than three months to provide the information?	No		
2	When writing to members about a cash transfer sum or a contribution refund do you give them at least three months to reply and are their wishes carried out within three months of receiving them?	Yes		

Communications and disclosure



Information to members

Scams

Notes:

- Applies
- When considering this module, you should also refer to the Pension Regulator's guidance on Dealing with transfer requests (on TPR website see Scheme management detailed guidance / Administration / Dealing with transfer requests). You should also have regard to industry good practice set out in the Pension Scams Industry Group (PSIG) Code of Good Practice.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you (or any third party administrator / shared service) have the appropriate internal controls in place to ensure that appropriate steps are taken to mitigate the risk of a scam?	Yes	Green	Yellow
2	Are you aware of the warning signs of a scam and do you consider whether these are present when dealing with member requests to transfer out or take benefits?	Yes	Green	Yellow
3	Do you ensure that members are provided with relevant information and communications to make them aware of the risks of pension scams?	Yes	Green	
4	Are appropriate due diligence checks carried out when members request a transfer out of the scheme to a Defined Contribution arrangement, where appropriate, and is a check made that at least one of the conditions for a transfer to proceed has been met (i.e. not applicable for a club transfer)?	Yes	Green	Yellow

Communications and disclosure



Public information

Publishing scheme information (PSPS)

Notes:

- **Mostly applies / Partially good practice.** Whilst most of this module applies for Public Service Pension Schemes we note that it includes a paragraph (paragraph 6) which sets out a number of items which scheme managers 'may' wish to publish. Therefore we have shown the question relating to this paragraph as being good practice only.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you publish and maintain the required information about the PB (i.e. who the PB members are, scheme member representation and the matters the PB is responsible for)?	Yes		
2	Do you publish other useful related information about the PB as set out in paragraph 6 of this module?	Partially		
3	Do you have policies and processes to monitor all published data relating to the PB on an ongoing basis to ensure it is accurate and complete?	Yes		
4	Do you ensure any out of date or incorrect information identified is updated as soon as possible and in any event within one month?	No		

Communications and disclosure



Public information

Dispute resolution procedures

Notes:

- **Mostly applies / Partially good practice.** Whilst most of this module applies for Public Service Pension Schemes we note that it includes a paragraph (paragraph 12) which refers to good practice. Therefore we have shown the questions relating to this paragraph as being good practice only.

- **This module forms part of an Effective System of Governance.**

- **The TPR Code clearly states that for Public Service Pension Schemes where the regulations provide for shorter periods to consider grievances than that specified in the Code, those regulations will apply. Therefore, when considering the information in this module, you should also be aware of the scheme specific requirements including regulations 72 to 79 of the Local Government Pension Scheme Regulations 2013.**

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a formal internal dispute resolution procedure including a documented and clear application process for members and prospective members to follow?	Yes	Green	Green
2	Do you provide your internal dispute resolution procedure to:		Green	Yellow
2 a	▪ Prospective members where practical?	Yes	Green	Red
2 b	▪ Any scheme members who may not have been given the information?	Yes	Green	Green
2 c	▪ On request from members, if not already provided in the previous 12 months?	Yes	Green	Green

Question ID	Question	Answer	Current Score	Previous Score
3	Do you provide members with information about the Money and Pensions Service and the Pensions Ombudsman at certain stages of the dispute?	Yes		
4	Do you regularly review and assess compliance with legislation and the effectiveness of your dispute procedure, including ensuring all appropriate information is available and whether separate advice is required to reach a decision?	Yes		
5	Do you have an appointed person (the adjudicator) for dealing with stage 1 disputes and is this person's contact details provided when providing members with the dispute procedure and notifying members of a first instance decision?	Yes		
6	Is the following information made available to members / prospective members as part of any notification of their rights or liabilities under the scheme:			
6 a	▪ The process to apply for a dispute to be resolved, including to who?	Yes		
6 b	▪ The information that an applicant must include?	Yes		
6 c	▪ The process by which decisions are reached?	Yes		
7	Do you ensure that timescales relating to the different stages of the dispute procedure meet the requirements of the LGPS regulations and the Code?	Yes		
8	Does your published procedure include the time limits within which members or prospective members must make an application?	Yes		
9	Do you make your procedure accessible to members and potential applicants by publishing it on a scheme website?	Yes		
10	Do you keep applicants informed of the progress of their dispute, in particular if it is looking likely the timeframes may not be met?	Yes		

Reporting to TPR



Regular reports

Registrable information and scheme returns

Notes:
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Is your Fund / scheme registered with TPR?	Yes		
2	Are you aware of the requirement to report any changes to registrable information to TPR as soon as is reasonably practicable, and at the very latest, within five working days of you becoming aware of the change? (Note this includes changes to contact details and employers).	Yes		
3	Do you ensure that your scheme return is completed accurately and submitted annually in the required timescale?	Yes		

Reporting to TPR



Whistleblowing – reporting breaches of the law

Who must report

Notes:

- Applies
- When considering this module, you should also refer to the Pension Regulator’s guidance on Complying with the duty to report breaches of law (on TPR website see Scheme management detailed guidance / Communications and reporting / Complying with the duty to report breaches of law).

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have arrangements in place, such as a documented Breaches of the Law Procedure (or equivalent) and separate processes, to ensure breaches of the law are identified, recorded and managed?	Partially		
2	Is this Procedure (or equivalent) regularly reviewed (at least every three years), and is it currently up to date, accurate, relevant and in accordance with legal and Code requirements?	Yes		
3	Have you provided your Breaches of the Law Procedure (or equivalent) to those responsible for reporting breaches to ensure they are aware of their legal responsibilities and requirements of the Code to report breaches to TPR (i.e. Fund Officers, PCs (or equivalent), PBs, Service Providers, Employers, Professional Advisers)?	No		
4	Do you provide additional training on reporting breaches to those responsible for reporting breaches and does this highlight (a) that breaches of the law go beyond administrative tasks and record keeping and (b) the whistleblowing protection?	No		

Reporting to TPR



Whistleblowing – reporting breaches of the law

Decision to report

Notes:

- Applies
- When considering this module, you should also refer to the Pension Regulator’s guidance on Complying with the duty to report breaches of law (on TPR website see Scheme management detailed guidance / Communications and reporting / Complying with the duty to report breaches of law).

Question ID	Question	Answer	Current Score	Previous Score
1	Does your Breaches of the Law Procedure (or equivalent) include information to ensure that TPR’s expectations for identifying and assessing breaches are met?	Yes		
2	Does your Breaches of the Law Procedure (or equivalent) include a process to determine whether a breach or potential breach of the law is of “material significance” taking into account the cause, effect and reaction to the breach, including where TPR guidance can be found?	Partially		

Reporting to TPR



Whistleblowing – reporting breaches of the law

How to report

Notes:

- Applies

- When considering this module, you should also refer to the Pension Regulator’s guidance on Complying with the duty to report breaches of law (on TPR website see Scheme management detailed guidance / Communications and reporting / Complying with the duty to report breaches of law).

Question ID	Question	Answer	Current Score	Previous Score
1	Does your Breaches of the Law Procedure (or equivalent) include all the elements within paragraph 2a to 2f of this module?	Yes		
2	Do you make information available to those responsible for reporting breaches for your Fund setting out how to make a report to TPR, what should be included in the report and the timescales within which the report should be made?	Yes		
3	Do you have a system in place for recording breaches, even if they are not reported to TPR (e.g. in a Breaches Log) including ongoing assessment of those breaches?	Partially		

Reporting to TPR



Whistleblowing – reporting breaches of the law

Reporting payment failures

Notes:
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a process in place to ensure all those who have a duty to report breaches report all contribution payment failures deemed to be of material significance to TPR, and within the timeframes specified in the Code?	No		
2	Do you have a system in place for recording all contribution payment failures, even if they are not reported to TPR (e.g. in a Breaches Log)?	No		