

Appendix A - Independent Governance Review (IGR) Action Plan

No.	Actions	Target Date	Owner	October 2025 Update	Status at Oct 2025
1	Regulatory Breaches	December 2025	Assistant Director - Pensions		
	New / updated procedure and log for ensuring all breaches are recorded, whether material / reportable or not. (This is in addition to continuing to ensure that all material breaches are also reported).	<i>Note - this action is also part of the Annual Governance Statement action plan.</i>		Draft breach procedure reviewed by LPB at the August 2025 meeting and recommended for approval to the Authority on the 4 September 2025.	Complete
	Aon suggests that information in the breaches log should include all expected areas such as RAG status			Breaches log in place. Further improvements to be considered in due course.	In progress
	Training for both staff and members Staff: Some training given in Oct 2024 with further guidance on the new procedure to be delivered before end of December 2024. Members: Session scheduled for March 2025			Authority and Board member training was completed 13 March 2025. Training for staff to be delivered by Technical Support and Training team by December 2025.	In progress
2	Review and update both the Authority and the LPB Constitutions	April 2025 (LPB) June 2025 (Authority)	Head of Governance & Corporate Services		
	Prohibit dual membership			Completed and reflected in the Constitutions	Complete
	Quoracy for Authority meetings - Increase to 4.			Completed and reflected in the Constitution	Complete
	Add further details on Investment Advisory Panel, including Terms of Reference			Completed and reflected in the Constitution	Complete
	Conflict of Interests Policies - to be reviewed and combined into one policy that will apply to both.			Completed and reflected in the Constitutions	Complete
	Add cross-referencing to the Conflicts of Interest Policy in the various Constitutional documents (including Codes) where Local Authority requirements relating to interests are being referenced. This would remind members and officers that the SYPA has a policy that goes beyond Local Authority requirements.			Completed and reflected in the Constitutions	Complete
	Clarify in Authority Constitution that LPB members can observe, including private papers (with certain exceptions)			Completed and reflected in the Constitutions	Complete
	Clarify LPB member role in clause 3 of the Board's Constitution re: Breaches of Law and check timescales for reporting breaches			Training was completed on roles and responsibilities in March 2025. The wording in Section 3 of the Board's Constitution will be reviewed against the recommendations in Aon's report and any updates required will be made at the next annual review in 2026.	In progress
	Add detail in LPB Constitution on role of Independent Adviser			Completed and reflected in the Constitution	Complete
	Create a separate roles and responsibilities matrix (to meet Good Governance requirements)			Role profiles created for each member role across the Authority, its sub committees and the Local Pension Board in August 2025 and will be shared with existing members. Production of a separate roles and responsibilities matrix in line with Good Governance requirements will be considered when the guidance and regulations for this have been published.	Complete In progress
	Other textual updates and clarifications			Completed and reflected in the Constitutions	Complete
	<i>Governance Map - idea suggested by Aon of creating an overview map with links to various documents in place for Governance</i>	<i>We will consider this when reviewing the Constitutions</i>		This has yet to be developed – will aim to consider and plan for any work on this to take place over the course of the next year to June 2026.	Not yet started

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3	Pensions Administration Strategy (PAS) Review	September 2025	Assistant Director - Pensions		
	Undertake a full and comprehensive review for the next update of this strategy.			The PAS has been re-drafted after a comprehensive review. The revised strategy was approved by the Authority in September 2025.	Complete
	Set the review cycle to once every three years.			This is now set as the review cycle going forward for this strategy. Therefore, the next review will be scheduled for Sept 2028 in line with the triennial valuation cycle.	Complete
4	Investment Strategy Statement and Stewardship Code	As below	Assistant Director - Investment Strategy		
	Arrange for wider consultation and document this in next ISS Review	March 2026		All on track as part of the ISS project	In progress
	Consider requirements around investment and funding risk modelling (stress test, scenario test) as part of the ISS review	March 2026		All on track as part of the ISS project	In progress
	Update information on website about Stewardship Code	March 2025		Complete: Stewardship	Complete
5	Document Updates when next reviewed (Specific textual amendments / other updates or additions as recommended in Aon's report)	As below	As below		
	Corporate Strategy - include all Policy / Strategy review dates (i.e. Policy Tracker) and the Procurement Forward Plan as Appendices	February 2025	Assistant Director - Resources & Team Leader Governance	The forward procurement plan was approved and is published as part of the Corporate Planning Framework in February 2025. Available here: Corporate Plans Review dates for policies and strategies are being tracked on a policy tracker – this is currently an internal-facing document co-ordinated by the Governance team. Consideration will be given to a summarised version containing key policy /strategy review dates only to be published with the corporate planning framework at the next annual review.	Complete
	Governance Compliance Statement (Additionally - ensure a further, thorough review of this statement is carried out against the SAB Good Governance requirements whenever the new guidance is released).	February 2025	Head of Governance & Corporate Services	GCS approved by A&G Committee 7 March 2025. Review against the new requirements will be undertaken when the guidance / regulations are available.	Complete Not yet started
	Administering Authority Discretions Policy Statement	June 2026	Assistant Director - Pensions & Team Leader Governance	Will be actioned as part of the planned Policy Statement Review in June 2026	Not yet started
6	Risk Register	Completed August 2024	Team Leader - Governance		
	Remove category of 'operational' and use Pensions Admin and Organisational instead as relevant.	Completed		Completed and system updated	Complete
	Consider if sufficient detail covered on single person risk (AD-IS and IIAs) and on Authority/LPB member knowledge.	Completed		Completed – new risk captured in relation to business continuity and single person risk. Ongoing review as part of corporate risk register.	Complete

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7	Consistency and templates for reports and policy documents	September 2025 – revised to June 2026	Assistant Director - Resources	Revised target date has been set for these actions – more time required due to staff vacancy in the team and other workload priorities.	
	Project to create / review document templates for policies, procedures, strategies and reports - ensuring key details included as per Aon findings.			As new strategy documents have been produced, the formatting has been reviewed and made consistent, including a consistent 'Document Control' page as an interim measure pending the full project to achieve this action. Aiming for progress to take place from October 2025 to commence the project.	Not yet started
	Arrange report writing training as part of this.			Still to be scheduled as part of above project.	Not yet started
	Consider issue of ensuring a covering report on all Authority / LPB / Committee papers addressing executive summary issue also highlighted in Aon findings.			Will be considered and actioned as part of above project.	Not yet started
	Note - all reviews of policies or new policies created in the meantime, we will ensure the key details are included. This will be monitored through the policy tracker.	<i>Ongoing</i>	<i>Team Leader - Governance</i>	Completed – this is taking place as policy documents are reviewed or new ones produced.	Complete
8	Democratic Support - Various:	As below	As below		
	<u>Member Turnover / Succession Planning</u>				
	Discussion with Chief Executives of the Councils with most turnover - to seek views on aiming to limit changes in Authority / LPB Membership to those required by changes in electoral outcomes. Director will discuss with SYPA's Clerk and BMBC CE, Sarah Norman, at their next meeting.	By February 2025	Director	Discussion has taken place. Outcome no further action to be taken.	Complete
	LPB - advertising further in advance (now in place) and seek to stagger terms of office.	Completed	Head of Governance & Corporate Services	Succession planning embedded in all governance processes and monitored / reported regularly.	Complete
	LPB - explore idea of giving an observer seat to a MAT employer as part of succession planning for Nicola Gregory	November 2024 to August 2025	Head of Governance & Corporate Services	This is continuing to be explored as part of active succession planning for the Board and ongoing work to raise the profile of the Board and attract more candidates for representative vacancies when they occur.	Complete
	<u>Relationship between Authority & LPB:</u>				
	Ensuring more pre-legislative scrutiny by LPB prior to approval by Authority	Ongoing.	Director and Head of Governance & Corporate Services	Completed. Work programme planning processes aim to ensure that all key policies, strategy and other key decisions scheduled for the Authority are presented first to the LPB for scrutiny.	Complete
	Discuss with both Chairs encouragement for LPB members to attend Authority meetings as observers	November 2024 Joint Meeting	Head of Governance & Corporate Services	Completed. LPB and Authority Chair/Vice Chairs approval to attend 2025/26 meetings on a quarterly basis	Complete
	Explore further with the respective Chairs and Vice Chairs on any more actions to consider for raising the profile of LPB with the Authority.	February 2025	Head of Governance & Corporate Services	Completed. This was a subject discussed in the 2025 effectiveness reviews of both Authority and LPB. From the LPB review, a separate action plan was agreed that included arrangements for the Board's Chair/Vice Chair to attend and report on the outcomes from Board meetings to the Authority; and for the Authority Chair / Vice Chair to attend LPB meetings.	Complete

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				Also arranged for the LPB Chair/VC to attend Employer Forum in Nov 2025 and articles to be placed in both employer and scheme member newsletters on the work of the Local Pension Board.	
	Now publishing Authority private packs in reading room with email to LPB members at same time - where we'll include a reminder that LPB members are welcome to attend or watch the webcast (we'll include link)	Completed September 2024	Head of Governance & Corporate Services		Complete
	Authority to conduct annual effectiveness review. First one scheduled for February 2025.	February 2025	Head of Governance & Corporate Services	Completed February 2025	Complete
	Guidance will be given to those presenting papers to use pack page numbers when introducing reports and pause as needed to help members follow.	September 2024 onwards	Team Leader - Governance	Completed and implemented in all meetings.	Complete
	Consider scope for having report packs on screen in the meetings to help members follow when officers talking through them	Will investigate if this would be possible over next few months to February 2025.	Assistant Director - Resources	Officers are currently exploring options for an upgrade to the technology used for streaming meetings from the Events room that will potentially include adding an extra monitor in the room as well as greater functionality to enable the monitors to be used for presentations, Teams /remote attendance, and for having reports on screen. This will be a fairly significant project that will take some months to implement.	In Progress
	Not directly from review but from working group - action to update website regarding public attendance at meetings / asking questions	31 December 2024	Team Leader - Governance	Completed – Public Involvement at Pensions Authority Meetings	Complete
	Reading room to be re-organised to make more user-friendly.	31 December 2024	Assistant Director - Resources	Completed and launched in June 2025.	Complete
9	Member Knowledge & Skills	As below	As below		
	Develop individual training plans. (Including consideration of how to promote / encourage LPB members attending or viewing Authority meetings).	April 2025	Head of Governance & Corporate Services	Completed – new process launched, and individual one-to-one meetings took place during June and July 2025. Analysis of the results now being used to inform planning for contents of Members CPD Away Day in November 2025 and will feed into the member L&D strategy.	Complete
	Provide chairing skills training for the Chairs / Vice Chairs	Completed - Sept 2024	Governance Officer	Course attended in 2024 by the relevant members in these roles. Now forms part of learning plan for any members moving into these roles.	Complete
	Plan for above training and other support for next Authority Vice Chair / LPB	April 2025	Head of Governance & Corporate Services	Course identified and all Chair / Vice Chair holders supported to attend.	Complete
	Address concerns about knowledge assessment - providing member feedback to Hymans in advance of this year's National Knowledge Assessment	Feedback was provided prior to the NKA in October 2024.	Head of Governance & Corporate Services	Completed and revisited with each member during individual L&D sessions	Complete

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	Promote / strongly encourage attendance at external events. Officers to consider how to achieve this and build into the individual training plans and the Member L&D Strategy for 2025/26	March 2025	Head of Governance & Corporate Services	Completed, discussed with each member during L&D sessions. In 2025, there was strong attendance (Authority Chair, LPB Chair and LPB Vice Chair) at the PLSA Local Authority Conference in June, and 8 Authority and LPB members attended the Border to Coast Conference in September.	Complete
10	Delegated Decisions Process	June 2025 – revised to March 2026	Assistant Director - Resources		
	Review the process, forms and produce internal guidance as well as clarity on which decisions published on website - complete review alongside the updating of Constitutions.			This was not completed as part of the 2025 review of Constitutions due to time pressures. Therefore, a revised date has been set for this piece of work to be completed by March 2026.	Not yet started
11	Carry forward in TPR Code Compliance Action Plan	Cross-reference to separate plans:	Assistant Director – Resources and Head of ICT	The actions listed here are tracked as part of the Code Compliance assessment and reporting process.	
	Cybercrime risk – implement actions identified in the TPR Code Compliance tool. Including actions to ensure these points identified in Aon’s review are addressed: a. Develop a wider Cyber Security Risk policy and cyber security hygiene guidance. b. Review data and asset mapping to identify the potential magnitude of cyber security risks from third party providers. c. Carry out a programme of ongoing specialist assessments against suppliers and providers (prioritised relative to the potential risk) d. Assess against TPR principles set out in their cyber guidance and also complete the cyber scorecard tool available from Aon.	Code Compliance Action Plan		The new internal-facing Cyber Security Strategy has been developed and is awaiting SMT approval. The actions listed here are tracked as part of the Code Compliance assessment and reporting process.	-
	Business continuity strategy	Corporate Strategy Annual Governance Statement		A new Corporate Business Continuity Plan has been created. Final sign off/approval is expected to be completed in September 2025.	-
12	Performance Management Framework	Cross-reference to separate plan:		This action is being separately tracked and reported upon in the quarterly Corporate Performance Reports.	
	Framework already in development - to ensure measures for all Authority objectives and achieve better consistency in reporting	Corporate Strategy Annual Governance Statement		-	-