



TPR General code of practice

London Borough of Hillingdon Pension Fund - Scheme Assessment

Prepared for: Hillingdon Council
London Borough of Hillingdon Pension Fund Committee
London Borough of Hillingdon Local Pension Board

Prepared by: Aon
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Introduction






TPR Code Compliance model

This report sets out how London Borough of Hillingdon Pension Fund complies with the Pension Regulator's (TPR) General code of practice (the Code) in relation to the management of the London Borough of Hillingdon 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 Hillingdon Council 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)
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 4 out of 5 modules



2 questions are red and 1 question is amber out of 30 questions.

Knowledge and understanding requirements

Fully compliant in 2 out of 2 modules



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

Advisers and service providers

Fully compliant in 0 out of 1 module



2 questions are red and no questions are amber out of 19 questions.

Risk Management

Fully compliant in 4 out of 6 modules



No questions are red and 2 questions are amber out of 50 questions. 1 question is unanswered.

Scheme governance

Fully compliant in 0 out of 1 module



No questions are red and 1 question is amber out of 24 questions.

Essential actions

- Get PC and PB to acknowledge and read particular section of Governance Policy and confirm understanding the contents.
- Consultation with Hillingdon Council, as administering authority necessary to ascertain and understand appointment procedure of PC members to ensure compliance.
- Timetable for a periodical review of LPB membership to be established, ensuring depth of knowledge is always available to the LPB.
- Policy covering removal and resignation of PB members to be formulated and agreed. Procedures for resignation and removal from PC is covered under the Council's constitution.
- Policy to be update wit particular reference points 9-15 from the TPR Code extract.
- Officers will consult and put together a documented polcies for making appointments of advisers and service providers

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.

The governing body



Board structure and activities

Essential Actions

Module	Question	Action
1 Role of the governing body	4	Get PC and PB to acknowledge and read particular section of Governance Policy and confirm understanding the contents.
2 Recruitment and appointment to the governing body	2	Consultation with Hillingdon Council, as administering authority necessary to ascertain and understand appointment procedure of PC members to ensure compliance.
3 Recruitment and appointment to the governing body	3	Timetable for a periodical review of LPB membership to be established, ensuring depth of knowledge is always available to the LPB.
4 Recruitment and appointment to the governing body	6	Policy covering removal and resignation of PB members to be formulated and agreed. Procedures for resignation and removal from PC is covered under the Council's constitution.

Other Actions

Module	Question	Action
1 Role of the governing body	1	Officers will liaise with Democratic Services and provide information about requisite knowledge and skills required for PC members to be considered, when Council makes appointments onto the PC.
2 Role of the governing body	2	The Council, through responsible officers have considered appointing paid LPB members and is still in consideration going forward. In order to assuage the recruitment difficulties to the LPB, co-opting members on to the board is another option being explored.
3 Role of the governing body	3	Training records of all PC and LPB members are kept, monitored and constantly updated for inclusion the quarterly PC meeting work programme. The Knowledge and Skills assesment for both PC and LPB will be conducted annually to ensure all members are up to date in all required area of knowledge. Next assesment is scheduled for January 2025.

4	Role of the governing body	4	An induction pack for PC members will be created and sent to both existing and newly appointed PC members to ensure they are aware of their responsibilities. Acknowledgement of receipt of the induction packs will be documented for monitoring via checklist of responses to induction pack.
5	Recruitment and appointment to the governing body	1	Communication to all categories of scheme membership to be ramped up through the Council's internal system, Hampshire portal and newsletters, then cascaded down to individual employers to encourage participation in LPB and expand pool talent of prospect LPB members.
6	Recruitment and appointment to the governing body	2	Equality, Diversity and Inclusion Policy for the Pension Fund is being developed and contents will be approved by PC and will become a policy to be considered for appointment of LPB members. The Council does have an EDI policy and it will be flagged up to Democratic Services that this should be in consideration for appointments to the PC.
7	Recruitment and appointment to the governing body	3	Consideration will be given to inclusion of Maximum term of LPB membership in the recruitment policy and time table to aid forward planning.
8	Recruitment and appointment to the governing body	4	Training records of all PC and LPB members are kept, monitored and constantly updated for inclusion in the quarterly PC meeting work programme. The Knowledge and Skills assessment for both PC and LPB will be conducted annually to ensure all members are up to date in all required areas of knowledge. Next assessment is scheduled for January 2025.
9	Recruitment and appointment to the governing body	5	Substitute PC members will now be mandated to undergo the same Knowledge and Skills assessments as PC members and training provided to ensure they have adequate knowledge to perform their duties when called upon.
10	Appointment and role of the chair	3	Plans for new chair induction will be formulated and become part of the process after election/selection is going forward. This will cover all expectations of the LPB chair under the GCoP.

Knowledge and understanding requirements

Essential Actions

Module	Question	Action
1 Knowledge and understanding	6	Policy to be updated with particular reference points 9-15 from the TPR Code extract.

Other Actions

Module	Question	Action
1 No Actions		

Advisers and service providers

Essential Actions

Module	Question	Action
1 Managing advisers and service providers	1	Officers will consult and put together a documented policies for making appointments of advisers and service providers

Other Actions

Module	Question	Action
1 No Actions		

Risk management

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 Identifying, evaluating and recording risks	5 a	To be reviewed more indepth .
2 Scheme continuity planning	1	Possibly write up a fund specific business continuity plan, incorporating those of other partners.
3 Conflicts of interest	8	TPR Criteria on Dealing with conflicts 9-21 will be checked against Fund policy to ensure compliance.

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)



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
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	

The governing body

Board structure and activities



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)).**

Question ID	Question	Answer	Current 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)?	Yes	Green
2	Do you have processes in place to ensure recruitment practices of members to the PC (or equivalent) and PB are inclusive?	Partially	Yellow
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?	No	Red
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	Green
5	Does succession planning take place (to the extent it is able to)?	Yes	Green

Question ID	Question	Answer	Current 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?	No	
7	Do you have a process for ensuring that appropriate representation as required by the LGPS regulations / local government legislation is maintained?	Yes	

The governing body

Board structure and activities

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
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)?	Yes	
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)?	Yes	

The governing body

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
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
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
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?	N/A	
4	Does your remuneration and fee policy cover all areas set out in the Code (see paragraph 3 of this module)?	N/A	

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
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
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
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?	Yes	

Question ID	Question	Answer	Current 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?	Yes	
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
1	Do you have agreed and documented policies for making appointments to the Fund?	No	
2	Is the policy for selecting advisers and service providers approved by the PC (or equivalent) and reviewed at least every three years?	No	
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?	Yes	

Question ID	Question	Answer	Current Score
8	Is there an agreed process in place for ongoing management of advisers, recording decisions taken, as well as escalation points?	Yes	
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?	Yes	
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?	Yes	
17	When considering replacing a service provider, do you consider the interests of the scheme members?	Yes	

Question ID	Question	Answer	Current 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
1	Do you have a Risk Management Policy approved by the PC (or equivalent)?	Yes	Green
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	Green
3	Do you have a risk register to record all risks identified and action taken?	Yes	Green
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	Green
5	Do you consider all of the following types of risks alongside appropriate risk mitigation techniques:		Green
5 a	▪ scheme investments, including asset-liability management	Yes	Green
5 b	▪ operation resilience, including for service providers	Yes	Green
5 c	▪ insurances, compensation funds, and other risk-mitigation techniques	No	Red
5 d	▪ environmental, social, and governance risks	Yes	Green
5 e	▪ scheme funding and covenant strength	Yes	Green
5 f	▪ the risk of fraud	Yes	Green
5 g	▪ failure to comply with the law and / or scheme rules	Yes	Green

Question ID	Question	Answer	Current 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
1	Do you maintain a risk management framework that clearly identifies the internal controls in place or required for mitigating risks?	Yes	Green
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	Green
3	Do the internal controls ensure you administer and manage the Fund / scheme in accordance with the requirements of the law and relevant regulations?	Yes	Green
4	Are your internal controls all documented?	Partially	Yellow
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)?	Partially	Yellow
6	When designing internal controls have you considered the expectations set out in the Code (see paragraph 17 in this module)?	Yes	Green

The governing body



Risk management

Assurance reports on internal controls

Notes:
- Applies

Question ID	Question	Answer	Current 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
1	Do you have a Fund-specific Business Continuity Plan (BCP)?	Yes	
2	Does the BCP include data and general administration?	Yes	
3	Are there clear roles and responsibilities in your BCP?	Yes	
4	Have any roles and responsibilities for service providers been agreed with them?	Yes	
5	Have you had assurance that advisers and service providers to the Fund have their own BCP in place?	Yes	
6	If you answered yes to Q5 did you review the information received from suppliers / advisers?	Yes	
7	Do you review your BCP and associated documents regularly (for example, annually) or on a change in system or process if sooner?	Yes	

Question ID	Question	Answer	Current Score
8	Does your Business Continuity approach ensure key member processes are prioritised?	Yes	
9	Does your BCP ensure continued access to resources, service and communications with key parties?	Yes	
10	Have you considered timeframes to bring new resources on board in a business continuity situation?	Yes	
11	Do you have contingency plans to address any under resourcing issues?	Yes	
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
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
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?	Yes	

The Governing Body



Risk management

Own risk assessment

Notes:

- Good practice

Question ID	Question	Answer	Current Score
1	Have you carried out an own risk assessment (ORA) of the effectiveness of the system of governance and the management of risks and controls?	Yes	
2	Has the ORA been carried out in a manner that includes an element of independence (e.g. a third party, internal audit or persons less involved in day-to-day governance / management of the Fund / scheme)?	Yes	
3	Is the ORA documented in writing, shared with members of the PC (or equivalent) and PB and officers and signed off by the Chair of the PC (or equivalent)?	Yes	
4	Is the ORA dated, is it recorded when the next ORA will be prepared, and any interim reviews anticipated?	Yes	
5	Does the ORA consider how it has assessed the effectiveness of each of the policies and procedures covered by it?	Yes	
6	Does your ORA include whether you consider the operation of the policies and procedures to be effective and why?	Yes	
7	Does the ORA include consideration of the effectiveness of, and risks arising from each element set out in paragraphs 14 to 19 of this module (e.g. policies for the governing body, risk management policies, investment, additional investment matters for defined benefit schemes, administration and payment of benefits)?	Yes	

The Governing Body

Scheme governance

Systems of governance



Notes:

- Good practice. Our interpretation is that this module is good practice for Public Service Pension Schemes. The questions we have set in relation to this module are designed to assist you in assessing whether you meet the elements of an Effective System of Governance (ESOG). The Code lists the modules which you should ensure compliance with in order to demonstrate an ESOG. As having an ESOG is good practice for Public Service Pension Schemes all questions in this module are being shown as good practice. However a number of the modules, or areas within modules, that make up an ESOG do apply for Public Service Pension Schemes and therefore you should refer back to these specific modules to ensure you are meeting those requirements.

- You should complete this module after you have finished the other modules in this model as listed below. To assist you in answering the questions we have shown your Red, Amber, Green (RAG) score for each module alongside the question. This has been calculated based on your answers to the questions of that module. For ease of reference we have also shown the application of each module for Public Service Pension Schemes. The RAG score does not automatically determine your answer to each question as some elements will be more applicable to demonstrating an ESOG than others, noting that the ESOG focuses on the policies, processes and procedures in place to manage the scheme and meet all legal requirements. However, the RAG score will be helpful, along with reviewing the questions and answers from each specific module, for you to determine whether you are able to demonstrate compliance with that element of an ESOG.

Question ID	Question	Application of modules that form part of an ESOG for Public Service Pension Schemes	RAG score	Answer	Current Score
1	Do you wholly or mainly meet the requirements of the Role of the governing body module (see paragraph 13 in relation to Management of activities)?	Applies	100%	Yes	
2	Do you wholly or mainly meet the requirements of the Meetings and decision-making module (see paragraph 13 in relation to Management of activities)?	Applies	100%	Yes	

Question ID	Question	Application of modules that form part of an ESOG for Public Service Pension Schemes	RAG score	Answer	Current Score
3	Do you wholly or mainly meet the requirements of the Remuneration and fee policy module (see paragraph 13 in relation to Management of activities)?	Good practice	100%	Yes	
4	Do you wholly or mainly meet the requirements of the Knowledge and understanding module (see paragraph 13 in relation to Management of activities)?	Partially applies / Partially good practice	100%	Yes	
5	Do you wholly or mainly meet the requirements of the Governance of knowledge and understanding module (see paragraph 13 in relation to Management of activities)?	Partially applies / Partially good practice	100%	Yes	
6	Do you wholly or mainly meet the requirements of the Dispute resolution procedures module (see paragraph 13 in relation to Management of activities)?	Mostly applies / Partially good practice	100%	Yes	
7	Do you wholly or mainly meet the requirements of the Scheme continuity planning module (see paragraph 13 in relation to Management of activities)?	Good practice	100%	Yes	
8	Do you wholly or mainly meet the requirements of the Appointment and role of the chair module (see paragraph 14 in relation to Organisational structure)?	Mostly good practice	100%	Yes	
9	Do you wholly or mainly meet the requirements of the Conflicts of interest module (see paragraph 14 in relation to Organisational structure)?	Partially applies / Partially good practice	100%	Yes	
10	Do you wholly or mainly meet the requirements of the Managing advisers and service providers module (see paragraph 14 in relation to Organisational structure)?	Good practice	89%	Yes	
11	Do you wholly or mainly meet the requirements of the Investment governance module (see paragraph 15 in relation to Investment matters)?	Good practice	93%	Yes	

Question ID	Question	Application of modules that form part of an ESOG for Public Service Pension Schemes	RAG score	Answer	Current Score
12	Do you wholly or mainly meet the requirements of the Investment monitoring module (see paragraph 15 in relation to Investment matters)?	Good practice	100%	Yes	
13	Do you wholly or mainly meet the requirements of the Stewardship module (see paragraph 15 in relation to Investment matters)?	Partially good practice	100%	Yes	
14	Do you wholly or mainly meet the requirements of the Climate change module (see paragraph 15 in relation to Investment matters)?	Partially applies / Partially good practice	100%	Yes	
15	Do you wholly or mainly meet the requirements of the General principles for member communications module (see paragraph 16 in relation to Communications and disclosure)?	Applies	100%	Yes	
16	Do you have a documented policy / procedure including a timetable to review (at least every three years) to assess whether the elements that make up each of the areas above are functioning properly?			Partially	
17	Do you wholly or mainly meet the requirements of the Identifying, evaluating and recording risks module in order to comply with the requirements for internal controls (see paragraph 24 in relation to Internal controls)?	Applies	91%	Yes	
18	Do you wholly or mainly meet the requirements of the Internal controls module in order to comply with the requirements for internal controls (see paragraph 24 in relation to Internal controls)?	Applies	83%	Yes	
19	Do you wholly or mainly meet the requirements of the Financial transactions module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	100%	Yes	
20	Do you wholly or mainly meet the requirements of the Record-keeping module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Partially applies / Partially good practice	97%	Yes	

Question ID	Question	Application of modules that form part of an ESOG for Public Service Pension Schemes	RAG score	Answer	Current Score
21	Do you wholly or mainly meet the requirements of the Data monitoring and improvement module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	100%	Yes	
22	Do you wholly or mainly meet the requirements of the Receiving contributions module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Partially applies	100%	Yes	
23	Do you wholly or mainly meet the requirements of the Monitoring contributions module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	86%	Yes	
24	Do you wholly or mainly meet the requirements of the Maintenance of IT systems module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	100%	Yes	



Funding and investment

Funding and investment – at a glance



Investment

Fully compliant in 3 out of 4 modules



No questions are red and no questions are amber out of 37 questions. 1 question is unanswered.

Essential actions

None

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



Investment

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 No Actions		

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.



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
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
5	Do you ensure that those making investment decisions have the necessary skills, knowledge, information and resources?	Yes	
6	Do you obtain advice and other inputs required from a suitably qualified person to properly govern the scheme's investments?	Yes	
7	Is the governance structure relating to the assessment of investment risks reviewed regularly and appropriate for your Fund?	Yes	
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	
9	Are there clear strategic objectives set for appointed investment advisers?		
10	Does your ISS consider potential long-term effects on scheme investments?	Yes	
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	
12	Does the PC (or equivalent) consider the performance of investments quarterly, against the benchmark objectives?	Yes	
13	Do you ensure that your Additional Voluntary Contribution (AVC) arrangements meet the requirements of the Code in relation to DC elements (see list in paragraph 10 of this module)?	N/A	
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	

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
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?	Yes	

Question ID	Question	Answer	Current 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?	N/A	
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 section, 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
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
1	Do you assess the risks and opportunities associated with climate change as part of your risk management?	Yes	
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?	Yes	
4	Do you document processes for identifying and assessing climate-related risks and opportunities and integrate these into your risk management and governance arrangements?	Yes	
5	Do you ensure you oversee, assess, and manage climate-related risks and opportunities relating to the Fund?	Yes	



Administration

Administration – at a glance



Scheme administration

Fully compliant in 1 out of 1 module



No questions are red and no questions are amber out of 16 questions.

Information handling

Fully compliant in 3 out of 4 modules



No questions are red and 1 question is amber out of 42 questions.

IT

Fully compliant in 1 out of 2 modules



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

Contributions

Fully compliant in 2 out of 3 modules



1 question is red and no questions are amber out of 13 questions.

Essential actions

None

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



Scheme administration

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 Planning and maintaining administration	2	Bespoke Administration issues training will be provided to all PC & LPB, in conjunction with our administration partners, Hamshire Pension Services

Information handling

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 No Actions		

IT

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 No Actions		

Contributions

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 No Actions		

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)

IT

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

Contributions

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



Administration



Scheme administration

Planning and maintaining administration

Notes:
- Applies

Question ID	Question	Answer	Current 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)?	Yes	
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?	Yes	
5 b	▪ Consideration of quality and value for members when selecting the administrator?	Yes	
6	Is administration considered at all (or most) meetings of the PB and PC (or equivalent)?	Yes	

Question ID	Question	Answer	Current 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)?	Yes	
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?	Yes	
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?	Yes	
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?	Yes	

Question ID	Question	Answer	Current 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?	Yes	

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
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
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?	Yes	

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
1	Do you have clear procedures to deal with transfer out requests in a timely manner?	Yes	
2	Do you:		
2 a	▪ monitor whether you provide CETVs within the legal timeframe?	Yes	
2 b	▪ provide CETVs within the legal timeframe?	Yes	
2 c	▪ complete transfer out payments within the legal timeframe?	Yes	
3	Do you undertake the necessary checks before transferring member benefits to another arrangement, including:		
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	

Question ID	Question	Answer	Current 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 DC 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 DC 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
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
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?	Yes	
4	Do you (and any third-party administrator / shared service) store data securely and for legitimate purposes only on administration systems?	Yes	
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?	Yes	

Question ID	Question	Answer	Current 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?	Partially	
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
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
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)?	Yes	
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)?	Yes	
5	Is a data improvement plan in place which is being monitored, actions progressed, and with defined target dates?	Yes	
6	Have you clearly documented decisions / policies related to areas where data cannot be corrected?	Yes	

Question ID	Question	Answer	Current 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
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
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).**

Question ID	Question	Answer	Current 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)?	No	
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
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?	No	
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)?	No	
9	Do you receive appropriate assurance of service providers' internal cyber controls?	Yes	

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
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
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	Green
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?	No	Red
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?	Yes	Green
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	Green
5	Do you carry out regular (at least annual) spot checks on the amount of scheme member contributions being deducted by employers?	Yes	Green

Question ID	Question	Answer	Current 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
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)?	Yes	
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?	Yes	
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?	Yes	



Communications and disclosure

Communications and disclosure – at a glance



Information to members

Fully compliant in 5 out of 5 modules



No questions are red and no questions are amber out of 22 questions.

Public information

Fully compliant in 2 out of 2 modules



No questions are red and no questions are amber out of 14 questions.

Essential actions

None

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.

Communication and disclosure



Information to members

Essential Actions

Module	Question	Action
1 No Actions		

Other Actions

Module	Question	Action
1 No Actions		

Public information

Essential Actions

Module	Question	Action
1 No Actions		

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:

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



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
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?	Yes	
1 c	▪ meet these legal requirements in relation to the information being provided within the required timescales?	Yes	
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?	Yes	

Question ID	Question	Answer	Current 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?	Yes	
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
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?	Yes	
5	Do the annual benefit statements provided to members with AVCs meet the legal requirements in relation to the information provided?	Yes	

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
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
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?	Yes	
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
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	
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	
3	Do you ensure that members are provided with relevant information and communications to make them aware of the risks of pension scams?	Yes	
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	

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
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?	Yes	
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?	Yes	

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
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	
2	Do you provide your internal dispute resolution procedure to:		
2 a	▪ Prospective members where practical?	Yes	
2 b	▪ Any scheme members who may not have been given the information?	Yes	
2 c	▪ On request from members, if not already provided in the previous 12 months?	Yes	

Question ID	Question	Answer	Current 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

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 4 out of 4 modules



No questions are red and no questions are amber out of 11 questions.

Essential actions

None

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



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	No Actions	

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:

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



Reporting to TPR



Regular reports

Registrable information and scheme returns

Notes:
- Applies

Question ID	Question	Answer	Current 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
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?	Yes	
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)?	Yes	
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?	Yes	

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
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?	Yes	

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
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?	Yes	

Reporting to TPR



Whistleblowing – reporting breaches of the law

Reporting payment failures

Notes:
- Applies

Question ID	Question	Answer	Current 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?	Yes	
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)?	Yes	

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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