

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
A1	Is your scheme registered with the Pension Regulator?	<p>Managers of public service pension schemes that are ‘registerable schemes’ must register their scheme with the Pensions Regulator (TPR). A ‘registerable scheme’ is an occupational or personal pension scheme which is registered with HMRC and has more than one member.</p> <p>HMRC have indicated that the new arrangements for the 2014 LGPS in England and Wales and the 2015 LGPS in Northern Ireland will not be treated by them as new pension schemes, but as part of the schemes that were already in place. Where a scheme doesn’t need to be registered further with HMRC, no further registration of that scheme with TPR is required, as existing schemes should already be registered with TPR.</p> <p>However, the managers of these schemes (which may be the local administering authorities) should ensure that their scheme (or part of the scheme for which they are responsible) is properly registered with us. They must also let us know of any changes to their scheme’s (or part of the scheme’s) ‘registerable information’ and provide up-to-date information as soon as possible.</p> <p>Managers must provide ‘registerable information’ when they register with TPR. ‘Registerable information’ includes details about:</p> <ul style="list-style-type: none"> - the scheme - the managers of the scheme - employers. 	Yes the PSR number is 10079156		

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A2	Is the information held on the Pensions Regulator's website about the scheme up-to-date?	<p>It is a legal requirement for managers of a scheme to notify TPR of changes to their scheme's registerable information as soon as possible, and they can be fined if they don't do so.</p> <p>In the future the TPR's Exchange online service will be available to view and update schemes' registerable information online. In the meantime, if you need to update information you should contact TPR directly.</p>	Yes		
A3	Have you completed this latest Scheme Return in the required timescale?	<p>Also in the future the TPR will issue bespoke scheme returns for public service schemes to complete. These will ask for registerable and other information on a regular basis (at least every three years). This is in addition to the ongoing duty for managers to notify TPR of changes to registerable information as soon as possible. In the private sector, these are required for TPR on an annual basis and include membership, employer, asset, valuation and contact details. These are issued for completion in around January of each year.</p>	This return has been completed at the request of LPB.		
A4	Have you responded to the latest TPR public service pension scheme survey /questionnaire?	<p>TPR also intends to issue periodic surveys to gather information in relation to how schemes demonstrate best practice. An initial (sample) survey was issued in March 2013 and a further survey is expected during 2015.</p>	Yes - latest TPR request for information was received in July 2015 and submitted in September 2015		
B1	Are there policies and arrangements in place to support pension board	<p>38 - Schemes should establish and maintain policies and arrangements for acquiring and retaining knowledge and understanding to support their pension board members.</p>	Yes - A Members Training plan continues to be		

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	members in acquiring and retaining knowledge and understanding?		developed for the Local Pension Board.		
B2	Has a person been designated to take responsibility for ensuring the framework is developed and implemented?	38 - Schemes should designate a person to take responsibility for ensuring that a framework is developed and implemented	Yes - Head of Audit West		

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B3	Is the Fund providing assistance to pension board members to determine the degree of knowledge and understanding required?	<p>48 - Schemes should assist individual pension board members to determine the degree of knowledge and understanding that is sufficient for them to effectively carry out their role, responsibilities and duties as a pension board member</p> <p>40 - Being 'conversant' means having a working knowledge of the scheme regulations and policies, so that pension board members can use them effectively when carrying out their duties</p> <p>49 - Pension board members must have a working knowledge of their scheme regulations and documented administration policies. They should understand their scheme regulations and policies in enough detail to know where they are relevant to an issue and where a particular provision or policy may apply</p> <p>50 - Pension board members must have knowledge and understanding of the law relating to pensions (and any other prescribed matters) sufficient for them to exercise the functions of their role. Pension board members should be aware of the range and extent of the law relating to pensions which applies to their scheme, and have sufficient understanding of the content and effect of that law to recognise when and how it impacts on their responsibilities and duties.</p> <p>52 - Pension board members' breadth of knowledge and understanding should be sufficient to allow them to understand fully and challenge any information or advice they are given. They should understand how that information or advice impacts on any issue or decision relevant to their responsibilities and duties.</p> <p>53 - Pension board members should ensure that they have the appropriate degree of knowledge and understanding of funding and investment matters relating to their scheme to enable them to effectively carry out their</p>	<p>Yes - the Local Pension Board have agreed an approach to its training of board members. Induction training was provided to all new members, and a self-assessment requested to establish areas of training that informed the Members Training Plan. Future training will be aligned with that of the Pension Fund Committee. Members are encouraged to attend relevant conferences and seminars. Briefing notes are provided on relevant topics</p>		

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		<p>role. This includes having a working knowledge of provisions in their scheme regulations and administration policies that relate to funding and investment, as well as knowledge and understanding of relevant law relating to pensions.54 - All board members should attain appropriate knowledge so that they are able to understand the relevant law in relation to their scheme and role. The degree of knowledge and understanding required of pension board members may vary according to the role of the board member, as well as the expertise of the board member. For example, a board member who is also a pensions law expert (for instance, as a result of their day job) should have a greater level of knowledge than that considered appropriate for board members without this background.</p>	<p>and all members are required to complete the TPR trustee toolkits. Budget has been allocated to allow the full implementation of these training plans.</p>		

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B4	Are the roles and responsibilities of pension boards and members of pension board clearly set out in scheme documentation?	47 - The roles, responsibilities and duties of pension boards and their individual members will vary between pension schemes. Matters for which the pension board is responsible will be set out in scheme regulations. Clear guidance on the roles, responsibilities and duties of pension boards and the members of those boards should be set out in scheme documentation.48 - Schemes should assist individual pension board members to determine the degree of knowledge and understanding that is sufficient for them to effectively carry out their role, responsibilities and duties as a pension board member.	Yes - this is outlined in the Terms of Reference and role specifications.		
B5	Are pension board members aware of their legal responsibility in terms of Knowledge and Understanding?	39 - It is the responsibility of individual pension board members to ensure that they have the appropriate degree of knowledge and understanding to enable them to properly exercise their functions as a member of the pension board.	Yes - this has formed the basis of the induction training and reinforced within two papers to the Board.		

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B6	Have all pension board members got access to copies of the scheme rules and relevant Fund documentation?	<p>40 - Pension board members must be conversant with their scheme rules, which are primarily found in the scheme regulations, and documented administration policies currently in force for their pension scheme. 42 - The following are examples of administration policies which the regulator considers to be particularly pertinent and would expect to be documented where relevant to a pension scheme, and with which pension board members must therefore be conversant where applicable. This list is not exhaustive:- any scheme-approved policies relating to:</p> <p>A) conflicts of interest and the register of interests B) record-keeping C) internal dispute resolution D) reporting breaches E) maintaining contributions to the scheme F) the appointment of pension board members-</p> <p>risk assessments/management and risk register policies for the scheme- scheme booklets, announcements and other key member and employer communications, which describe scheme policies and procedures- the roles, responsibilities and duties of the scheme manager, pension board and individual pension board members - terms of reference, structure and operational policies of the pension board and/or any sub-committee- statements of policy about the exercise of discretionary functions- statements of policy about communications with members and scheme employers- the pension administration strategy, or equivalent, and- any admission body (or equivalent) policies.43 - Documents which record policy about the administration of the scheme include those relating to funding and investment matters. For example, where relevant they must be conversant with the statement of</p>	Yes - members have been made aware of the scheme rules and relevant Fund documentation through the induction training.		

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		<p>investment principles and the funding strategy statement.⁴⁴</p> <p>- Pension board members must also be conversant with any other documented policies relating to the administration of the scheme. For example, where applicable, they must be conversant with policies relating to:- the contribution rate or amount (or the range/variability where there is no one single rate or amount) payable by employers participating in the scheme- statements of assurance (for example, assurance reports from administrators)- third party contracts and service level agreements- stewardship reports from outsourced service providers (for example, those performing outsourced activities such as scheme administration), including about compliance issues- scheme annual reports and accounts- accounting requirements relevant to the scheme- audit reports, including from outsourced service providers, and- other scheme-specific governance documents.⁴⁵</p> <p>- Where DC or DC AVC options are offered, pension board members should also be familiar with the requirements for the payment of member contributions to the providers, the principles relating to the operation of those arrangements, the choice of investments to be offered to members, the provider's investment and fund performance report and the payment schedule for such arrangements.</p>			

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B7	Is there an up-to-date list of the Fund specific documents with which pension board members need to be conversant in?	46 - Schemes should prepare and keep an updated list of the documents with which they consider pension board members need to be conversant. This will enable them to effectively carry out their role. They should make sure that both the list and the documents are available in accessible formats.	A list has been provided and access and each Board Member has been given a secure sign-one to a specific part of the Council's network to review and access relevant information.		
B8	Are all pension board members investing sufficient time in their learning and development?	55 - Pension board members should invest sufficient time in their learning and development alongside their other responsibilities and duties. Schemes should provide pension board members with the relevant training and support that they require. Training is an important part of the individual's role and will help to ensure that they have the necessary knowledge and understanding to effectively meet their legal obligations.	Budget is allocated to ensure the implementation of training plans. All training records will be monitored and summarised as part of the Boards Annual Report. All Board Members are aware of their obligations to allocate sufficient time and this is reviewed at each meeting.		

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B9	Does the Fund offer pre-appointment training for new pension board members or mentoring by existing members?	<p>56 - Newly appointed pension board members should be aware that their responsibilities and duties as a pension board member begin from the date they take up their post. Therefore, they should immediately start to familiarise themselves with the scheme regulations, documents recording policy about the administration of the scheme and relevant pensions law. Schemes should offer pre-appointment training or arrange for mentoring by existing pension board members.</p> <p>This can also ensure that historical and scheme-specific knowledge is retained when pension board members change.</p>	<p>Yes - induction training was provided when the Board was set up and will be repeated when new members are re-appointed. For new members joining after these sessions, one to one sessions are held with the Head of Pensions. The self-assessment process also tracks whether learning needs have been met and will be re-evaluated every 3 years.</p>		
B10	Is there a process in place for regularly assessing the pension board members' level of knowledge and	<p>57 - Pension board members should undertake a personal training needs analysis and regularly review their skills, competencies and knowledge to identify gaps or weaknesses. They should use a personalised training plan to document and address these promptly.</p>	<p>Yes - Self Assessments training is carried out on appointment to identify areas of</p>		

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	understanding is sufficient for their role, responsibilities and duties?	58 - Learning programmes should be flexible, allowing pension board members to update particular areas of learning where required and to acquire new areas of knowledge in the event of any change.	weakness. These will be reviewed every 3 years. Board member are encouraged to undertake further training and attend relevant courses.		
B11	Are records of learning activities being maintained?	60 - Schemes should keep appropriate records of the learning activities of individual pension board members and the board as a whole. This will help pension board members to demonstrate steps they have taken to comply with legal requirements and how they have mitigated risks associated with knowledge gaps. A good external learning programme will maintain records of the learning activities of individuals on the programme or of group activities, if these have taken place.	A members training log is maintained by the Head of Pensions.		
B12	Have the pension board members completed the Pension Regulator's toolkit for training on the Code of Practice number 14?	59 - The regulator has provided an e-learning programme to help meet the needs of pension board members, whether or not they have access to other learning. If schemes choose alternative learning programmes they should be confident that those programmes:- cover the type and degree of knowledge and understanding required- reflect the legal requirements, and- are delivered within an appropriate timescale.	Members have been asked to complete this by July 2016 which will be 12 months from appointment.	All Members to complete TPR trustee toolkit.	Jul-16

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C1	Does the Fund have a conflict of interest policy and procedure, which include identifying, monitoring and managing potential conflicts of interest?	<p>76 - Schemes should ensure that there is an agreed and documented conflicts policy and procedure, which includes identifying, monitoring and managing potential conflicts of interest. They should keep this under regular review. Policies and procedures should include examples of scenarios giving rise to conflicts of interest, how a conflict might arise specifically in relation to a pension board member and the process that pension board members and scheme managers should follow to address a situation where board members are subject to a potential or actual conflict of interest.</p> <p>86 - Schemes should establish and operate procedures which ensure that pension boards are not compromised by potentially conflicted members. They should consider and determine the roles and responsibilities of pension boards and individual board members carefully to ensure that conflicts of interest do not arise, nor are perceived to have arisen.</p> <p>Toolkit module - The policy should:</p> <ul style="list-style-type: none"> - outline the steps to be followed by pension board members and scheme managers to address a situation where board members have a potential or actual conflict of interest - include a three-stage process to identify, monitor and manage potential conflicts of interest - include examples of scenarios giving rise to conflicts 	Yes - a conflict of interest policy and procedure was agreed by the Board.		

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C2	Do pension board members have a clear understanding of their role, the circumstances in which they may have a conflict of interest and how to manage potential conflicts?	78 - Schemes should cultivate a culture of openness and transparency. They should recognise the need for continual consideration of potential conflicts. Disclosure of interests which have the potential to become conflicts of interest should not be ignored. Pension board members should have a clear understanding of their role and the circumstances in which they may find themselves in a position of conflict of interest. They should know how to manage potential conflicts.	Yes - training has been provided to Board members and declaration of interest is a standing agenda item		
C3	Have all Pension Board members provided appropriate information for the Administering Authority to determine whether a conflict exists (on appointment and from time to time)?	79 - Pension board members, and people who are proposed to be appointed to a pension board, must provide scheme managers with information that they reasonably require to be satisfied that pension board members and proposed members do not have a conflict of interest.	Prospective candidates are made aware of the responsibility to disclose potential interests upon appointment.		

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C4	Does the appointment process for pension board members require disclosure of interests and responsibilities which could become conflicts of interest?	<p>80 - Schemes should ensure that pension board members are appointed under procedures that require them to disclose any interests, including other responsibilities, which could become conflicts of interest and which may adversely affect their suitability for the role, before they are appointed.</p> <p>81 - All terms of engagement, for example appointment letters, should include a clause requiring disclosure of all interests, including any other responsibilities, which have the potential to become conflicts of interest, as soon as they arise. All interests disclosed should be recorded. See the section of this code on 'Monitoring potential conflicts'.</p> <p>82 - Schemes should take time to consider what important matters or decisions are likely to be considered during, for example, the year ahead and identify and consider any potential or actual conflicts of interest that may arise in the future. Pension board members should be notified as soon as practically possible and mitigations should be put in place to prevent these conflicts from materialising.</p>	Prospective candidates are made aware of the responsibility to disclose any potential interests upon appointment via the Board Terms of Reference. Board members are updated on forthcoming agenda items and the process for managing potential conflicts of interest is outlined in the Authority's Conflict of Interest Policy for Board Members.		
C5	Is the conflicts policy regularly reviewed?	76 - The conflicts policy and procedure should be regularly reviewed.	Yes and at least annually as part of considering the annual report.		

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C6	Does the Fund have a conflicts register and it is circulated for ongoing review and published?	83 - As part of their risk assessment process, schemes should identify, evaluate and manage dual interests which have the potential to become conflicts of interest and pose a risk to the scheme and possibly members, if they are not mitigated. Schemes should evaluate the nature of any dual interests and assess the likely consequences were a conflict of interest to materialise.84 - A register of interests should provide a simple and effective means of recording and monitoring dual interests and responsibilities. Schemes should also capture decisions about how to manage potential conflicts of interest in their risk registers or elsewhere. The register of interests and other relevant documents should be circulated to the pension board for ongoing review and published, for example on a scheme's website.Toolkit module - When managing conflicts of interest, it is essential that all conflicts of interest are recorded and the action taken is documented. The scheme should be able to demonstrate that records of conflicts are kept and that the register is monitored and reviewed regularly.	Members are updated on forthcoming agenda items and the process for managing potential conflicts of interest is online in the Authority's Conflict of Interest Policy for Board members. Conflicts of interest and actions taken will be recorded in the minutes of the meeting.		
C7	Is appropriate information included in the register?	Toolkit module - The register should outline areas where potential conflicts may arise and include details of: <ul style="list-style-type: none"> - all obligations owed by pension boards - all corporate hospitality offered (whether or not it has been accepted) - personal financial interests (such as significant investments in particular organisations) - other employment (for example where a pension board works with more than one scheme or where the spouse/family member of a pension board member works 	Obligations owned by the Pension Board are outlined in the Terms of Reference, and actions to be taken in the event of a potential conflict of interest		

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		<p>for an organisation which is bidding to provide services to the scheme) - actions or mitigations taken.</p>	<p>are outlined in the Board's Conflict of Interest Policy, both documents to which the Register is linked. The Register includes details as indicated in the tPR toolkit.</p>		
C8	<p>Is there a standing item on the agenda for declaring conflicts of interest?</p>	<p>85 - Conflicts of interest should be included as an opening agenda item at board meetings and revisited during the meeting, where necessary. This provides an opportunity for those present to declare any interests, including other responsibilities, which have the potential to become conflicts of interest, and to minute discussions about how they will be managed to prevent an actual conflict arising.</p> <p>Toolkit module - At the start of all pension board meetings it is good practice for pension board members to declare whether they have any new conflicts of interest, either due to a change in circumstances, or because of a particular item that is to be considered at the meeting.</p>	<p>Yes</p>		
C9	<p>Do those involved know how to report a conflict of interest?</p>	<p>Toolkit module - The policy should set this out.</p>	<p>Yes - outlined in policy and training has been provided</p>		
C10	<p>Is the number of employer and member</p>	<p>90 - While scheme regulations must require pension boards to have an equal number of employer and member representatives, there is flexibility to design arrangements</p>	<p>Yes - 3 of each with an independent non-</p>		

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	representatives on the board in line with legal requirements?	which best suit each scheme.	voting chairman		
C11	Is the board made up of the appropriate mix of representatives in order to minimise potential conflicts?	91 - Arrangements should be designed with regard to the principles of proportionality, fairness and transparency, and with the aim of ensuring that a pension board has the right balance of skills, experience and representation (for example, of membership categories and categories of employers participating in the scheme). Those responsible for appointing members to a pension board should also consider the mix of skills and experience needed on the pension board in order for the board to operate effectively in light of its particular role, responsibilities and duties.	Yes - this forms part of the recruitment process.		
D1	Does the Administering Authority publish information about the pension board?	95 - Scheme managers must publish the information required about the pension board and keep that information up-to-date. This will ensure that scheme members can easily access information about who the pension board members are, how pension scheme members are represented on the pension board and the responsibilities of the board as a whole.	Yes - on the Bath and North east Somerset Council website and by hyperlink via the Avon Pension Fund website.		

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D2	Does the Administering Authority publish other useful related information about the pension board?	<p>96 - When publishing information about the identity of pension board members, the representation of scheme members and matters for which the board is responsible, schemes should also publish useful related information about the pension board such as:</p> <ul style="list-style-type: none"> - the employment and job title (where relevant) and any other relevant position held by each board member - the pension board appointment process - who each pension board member represents - the full terms of reference for the pension board, including details of how it will operate, and - any specific roles and responsibilities of individual pension board members. 	<p>Yes - information is published on the Bath and North East Somerset Council website and by hyperlink via the Avon Pension Fund website. This includes details of members of the Board, the process for appointment, the terms of reference, the role specifications and links to all Board meeting agendas, papers and minutes.</p>		
D3	Is all the information about the Pension Board kept up-to-date?	<p>98 - Scheme managers must ensure that information published about the pension board is kept up-to-date. Schemes should have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete.</p>	<p>Yes - this is regularly reviewed by the Head of Business Finance and Pensions and Pensions Manager.</p>		

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D4	Does the Administering Authority public information about pension board business?	97 - Schemes should also consider publishing information about pension board business, for example board papers, agendas and minutes of meetings (redacted to the extent that they contain confidential information and/or data covered by the Data Protection Act 1998). They should consider any requests for additional information to be published, to encourage scheme member engagement and promote a culture of transparency.	Yes - links to all Board meeting agendas, papers and minutes are provided		
E1	Is there an agreed process for identifying and recording scheme risks?	106 - Before implementing an internal controls framework, schemes should carry out a risk assessment. They should begin by:- setting the objectives of the scheme- determining the various functions and activities carried out in the running of the scheme, and- identifying the main risks associated with those objectives, functions and activities.107 - An effective risk assessment process will help schemes to identify a wide range of internal and external risks, which are critical to the scheme and members. When identifying risks, schemes should refer to relevant sources of information, such as records of internal disputes and legislative breaches, the register of interests, internal and external audit reports and service contracts.108 - Once schemes have identified risks, they should record them in a risk register and review them regularly. Schemes should keep appropriate records to help scheme managers demonstrate steps they have taken to comply, if necessary, with legal requirements.	Yes - The Risk Register follows the Council's format for each service. It identifies the significant risks that could have a material impact on the Fund in terms of value, reputation, compliance or service provision and sets out the action taken to manage the riskThe Fund reviews all risks annually and the top ten risks and changes		

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			quarterly. The risk register is reported to the Pension Fund Committee on a quarterly basis.		

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E2	Does the Fund have an adequate process to evaluate risks and establish internal controls?	<p>109 - Not all risks will have the same potential impact on scheme operations and members or the same likelihood of materialising. Schemes should consider both these areas when determining the order of priority for managing risks and focus on those areas where the impact and likelihood of a risk materialising is high.</p> <p>110 - Many pension schemes will already have adequate internal controls in place, some of which may apply to a variety of the functions of the administering authority. Schemes should review their existing arrangements and procedures to determine whether they can prevent and detect errors in scheme operations and help mitigate pension scheme-related risks. For example, schemes could obtain assurance about their existing controls through direct testing or by obtaining reports on controls. Any such review should be appropriate to the outcome of the risk evaluation.</p> <p>111 - Schemes should consider what internal controls are appropriate to mitigate the main risks they have identified and how best to monitor them. For example, the scheme manager(s) for a funded scheme should establish and operate internal controls that regularly assess the effectiveness of investment-related decision making. Scheme managers for all pension schemes should establish and operate internal controls that regularly assess the effectiveness of data management and record-keeping.</p>	Yes - risks are assessed and prioritised using B&NES rating system based on impact and probability to rate them as either low, medium and high. Internal controls are annually tested by external and internal audit and reported to the Pension Fund Committee.		

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E3	Does the Administering Authority have a risk register to record all risks identified and action taken?	Schemes should use a risk register to record all risks. The risk register should contain: - details of the risks identified - the likelihood of the risk arising - the impact of the risk if it does arise - the actions taken to mitigate the risk - when mitigation action was taken - when the risk and mitigation should next be reviewed - who has responsibility for monitoring the risk, if it is not the scheme manager	Yes		

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E4	Does the Administering Authority review the effectiveness of the risk management and internal control systems of the Fund?	<p>101 - The scheme manager must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.</p> <p>A failure to have adequate internal controls may cause an administrative breach of the law.</p> <p>102 - For these purposes 'internal controls' means:</p> <ul style="list-style-type: none"> - arrangements and procedures to be followed in the administration and management of the scheme - systems and arrangements for monitoring that administration and management - arrangements and procedures to be followed for the safe custody and security of the assets of the scheme <p>103 - Internal controls should include:</p> <ul style="list-style-type: none"> - a clear separation of duties - processes for escalation and /decision making - documented procedures for assessing and managing risks, reviewing breaches of law and managing contributions <p>105 - The scheme's internal controls should address significant risks which are likely to have a material impact on the scheme. Scheme managers should employ a risk-based approach and ensure that sufficient time and attention is spent on identifying, evaluating and managing risks and developing and monitoring appropriate controls. They should seek advice, as necessary.</p>	<p>Internal controls are tested annually by internal audit with recommendation made to Senior Managers. These reports are reviewed by Pension Fund Committee, Local Pension Board and the Audit Committee of Wiltshire Council. A risk register is also maintained identifying and managing risks to the Fund. This is reviewed quarterly by the Pension Fund Committee.</p>		

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E5	Does the Administering Authority regularly review the risk register?		Yes		
E6	Is there a standing item on the Pension Board agenda to review scheme risks?	Establishing effective internal controls is not a one-off exercise and must take into account a changing environment as well as new and emerging risks. Procedures need to be in place to: - regularly monitor the effectiveness of internal control systems - ensure controls are kept up to date - ensure controls are capable of mitigating new and emerging risks	Yes		

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E7	Does the Administering Authority have adequate systems, arrangements and procedures (internal controls) in place for the administration and management of the Fund and are they documented ?	<p>101 - The scheme manager must establish and operate internal controls. These must be adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules and in accordance with the requirements of the law.</p> <p>A failure to have adequate internal controls may cause an administrative breach of the law.</p> <p>102 - For these purposes 'internal controls' means:</p> <ul style="list-style-type: none"> - arrangements and procedures to be followed in the administration and management of the scheme - systems and arrangements for monitoring that administration and management - arrangements and procedures to be followed for the safe custody and security of the assets of the scheme <p>103 - Internal controls should include:</p> <ul style="list-style-type: none"> - a clear separation of duties - processes for escalation and /decision making - documented procedures for assessing and managing risks, reviewing breaches of law and managing contributions <p>105 - The scheme's internal controls should address significant risks which are likely to have a material impact on the scheme. Scheme managers should employ a risk-based approach and ensure that sufficient time and attention is spent on identifying, evaluating and managing risks and developing and monitoring appropriate controls. They should seek advice, as necessary.</p>	There are documented procedures in place for all the key activities for the administration of the Fund. The administration system also uses a task management module which requires specific steps to be followed. These are kept under review by the Pensions Manager, Pension Benefits Manager, Pension Fund accountant and Technical & Compliance Manager in light of changes in regulations. Internal processes and		

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			are also regularly audited.		

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E8	Do these procedures apply equally to outsourced services, are internal controls reflected in contracts with third party providers and is there adequate reporting in relation to those controls?	<p>119 - The legal requirements apply equally where a scheme outsources services connected with the running of the scheme. Providers should be required to demonstrate that they will have adequate internal controls in their tenders for delivering services. The requirements should be incorporated in the terms of engagement and contract between the scheme and service provider. Outsourced services may include, for example, the maintenance of records and data, calculation of benefits and investment management services. Where services are outsourced, scheme managers should be satisfied that internal controls associated with those services are adequate and effective.</p> <p>120 - An increasing number of service providers are obtaining independent assurance reports to help demonstrate their ability to deliver quality administration services. Schemes should ask their service providers to demonstrate that they have adequate internal controls relating to the services they provide. It is vital that schemes ensure they receive sufficient assurance from service providers. For example, the information from providers should be sufficiently detailed and comprehensive and the service level agreements should cover all services that are outsourced. Schemes should also consider including provisions in contracts for outsourced services requiring compliance with appropriate standards. This should help to ensure effective administration.</p>	Yes - due diligence is carried out on all service providers at appointment and where appropriate. Within the investment scheme managers, all providers are assessed on appointment and reviewed annually thereafter.		

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F1	Do member records record the information required as defined in the Record Keeping Regulations and is it accurate?	<p>126 - Scheme managers must ensure that member data across all membership categories specified in the Record Keeping Regulations is complete and accurate. Member data should be subject to regular data evaluation.</p> <p>127 - Scheme managers must keep specific member data, which will enable them to uniquely identify a scheme member and calculate benefits correctly. This is particularly important with the establishment of career average revalue earnings (CARE) schemes. Scheme managers must be able to provide members with accurate information regarding their pension benefits (accrued benefits to date and their future projected entitlements) in accordance with legislative requirements, as well as pay the right benefits to the right person (including all beneficiaries) at the right time.</p>	Scheme member data is identified by a National Insurance number and unique member payroll ID.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
F2	Does the Fund have the appropriate processes in place so employers can provide timely and accurate information?	<p>128 - Schemes should require participating employers to provide them with timely and accurate data in order for the scheme manager to be able to fulfil their legal obligations. Schemes should seek to ensure that processes are established by employers which enable the transmission of complete and accurate data from the outset. Processes will vary from employer to employer, depending on factors such as employee turnover, pay periods, number of employees who are members and the timing and number of payroll processing systems.</p> <p>129 - Schemes should seek to ensure that employers understand the main events which require information about members to be passed from the employer to the scheme and/or another employer, such as when an employee:- joins or leaves the scheme- changes their rate of contributions- changes their name, address or salary- changes their member status, and- transfers employment between scheme employers.</p> <p>130 - Schemes should ensure that appropriate procedures and timescales are in place for scheme employers to provide updated information when member data changes, for checking scheme data against employer data and for receiving information which may affect the profile of the scheme. If an employer fails to act according to the procedures set out above, meaning that they and/or scheme managers may not be complying with legal requirements, those under a statutory duty to report breaches of the law to the regulator under section 70 of the Pensions Act 2004 should assess whether there has been a relevant breach and take action as necessary.</p>	<p>The APF has implemented a Pensions Administration Strategy detailing requirements from both a Fund and employer perspective. This includes agreed SLA targets for performance monitoring and reporting. Via the APF website, employers have access to guidance for supplying information to the Fund. Comprehensive training is provided by the Fund on an ongoing basis to both new and existing scheme</p>		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
			employers on required procedures. The Fund has implemented a process to ensure employers data submissions can be monitored, reported and addressed appropriately.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
F3	Does the Fund keep records of and reconcile transactions as required by the Record Keeping Regulations?	<p>131 - Schemes should be able to trace the flow of funds into and out of the scheme and reconcile these against expected contributions and scheme costs. In doing so, they will have clear oversight of the core scheme transactions and should be able to mitigate risks swiftly.</p> <p>132 - Scheme managers must keep records of transactions made to and from the scheme and any amount due to the scheme which has been written off. They should be able to demonstrate that they do so.</p>	<p>Reconciliations take place monthly for all key flow of funds in to the pension fund.</p> <p>Contributions are monitored and chased if not received with a escalation process in place.</p> <p>Transfers and pension strain on fund costs are reconciled on an ongoing basis.</p> <p>All amounts written off are approved in line with the current council policy.</p>		
F4	Are records kept of pension board meetings as required by the Record Keeping Regulations?	133 - Schemes must keep records of all pension board meetings. Schemes should also keep records of decisions made and key discussions, which may include topics such as compliance with policies in relation to the administration of the scheme. This will ensure there is a clear and transparent audit trail.	Yes		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
F5	Are records kept of decisions made by the pension board, outside of meetings as required by the Record Keeping Regulations?	<p>134 - Schemes must also record any decisions taken by members of the pension board other than at a pension board meeting, or by a committee/sub-committee of a pension board, including the date, time, and place of the decision and the names of board members participating in that decision.</p> <p>This will ensure that there is a clear and transparent audit trail of the decisions made in relation to the scheme.</p>	In the event of a decision made outside of a formal LPB , details of that decision, as required by the Record Keeping Regulations would be recorded and reported to the next ordinary meeting of the Board.		
F6	Are records retained for as long as they are needed?	<p>135 - Schemes should retain records for as long as is relevant for the purposes for which they are needed. It is likely data will need to be held for long periods of time. Schemes will need to keep some records for a member even after they have retired, ensuring that pension benefits can be settled for as long as they need to be paid. It is also important that schemes have in place systems and processes so they can keep records for the necessary amount of time.</p>	Yes. Member data is held on the pensions administration system, as well as a microfiche archive. In the event of system failure a DR process is in place and files are backed up daily.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
F7	Does the Administering Authority have policies and processes to monitor data on an ongoing basis?	<p>136 - Schemes should have policies and processes that monitor data on an ongoing basis to ensure it is accurate and complete, regardless of the volume of scheme transactions. This should be in relation to all membership categories, including pensioner member data where queries may arise once the pension is being paid.</p> <p>137 - Schemes should adopt a proportionate and risk-based approach to monitoring, based on any known or historical issues that may have occurred in relation to the scheme's administration. This is particularly important for the effective administration of CARE pension schemes, which requires schemes to hold significantly more data than needed for final salary schemes.</p>	Monthly data extract and reconciliation takes place between Fund administration and four Unitary Authorities (representing 75% of scheme membership) via approved middleware solution. Data for all other membership categories is reconciled annually through the year -end process.		
F8	Does the Administering Authority carry out a data review at least annually?	<p>138 - Schemes should continually review their data and carry out a data review exercise at least annually. This should include an assessment of the accuracy and completeness of the member information data held. Schemes should decide the frequency and nature of the review in light of factors such as the level of data quality, any issues identified and key scheme events.</p>	Yes. The Fund carries out a thorough reconciliation of member data as part of the Year End Process. Issues with poor or incomplete		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
			data are flagged up and addressed with employers on an ongoing basis.		
F9	Is a data improvement plan in place which is being monitored with a defined end date?	141 - Where schemes identify poor quality or missing data, they should put a data improvement plan in place to address these issues. The plan should have specific data improvement measures which schemes can monitor and a defined end date within a reasonable timeframe when the scheme will have complete and accurate data.	Yes. The Fund administration carried out initial testing of core data as at 1st August 2015 identifying 99.13% completeness of data overall. Data improvement reports are updated monthly and reported to both Pensions Committee & LPB. The reports have been developed to demonstrate work undertaken on the correction of historic cases identified together	Continued reporting to LPB & Pensions Committee on quarterly basis.	Ongoing

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
			with new cases identified during the reporting period.		
F10	Are processes and policies in place to reconcile scheme data with employer data?	142 - Schemes should ensure that member records are reconciled with information held by the employer, for example postal address or electronic address (email address) changes and new starters. Schemes should also ensure that the numbers of scheme members is as expected based on the number of leavers and joiners since the last reconciliation. Schemes should be able to determine those members who are approaching retirement, those who are active members and those who are deferred members.	Through agreed implemented middleware system, address changes are compared monthly and updated. New scheme starters are created and leavers are flagged. a full reconciliation accross all scheme employers is undertaken as part of the year end process.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
F11	Do the Administering Authority's member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	<p>143 - Schemes must ensure that member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles.</p> <p>144 - In relation to data management, schemes should understand:</p> <ul style="list-style-type: none"> - the obligations of data controllers - the difference between personal data and sensitive personal data - how data is held and how responses to data requests from different parties are handled - the systems required to store, move and destroy data 	Yes - The Council supports the aims of the eight principles of the DPA and is committed to processing personal data in a manner which is compatible with these Principles.		
G1	Does the Fund have procedures and processes in place to identify payment failures?	<p>150 - The scheme manager should ensure that there are effective procedures and processes in place to identify payment failures that are – and are not – of material significance to the regulator. A 'payment failure' is where contribution payments are not paid to the scheme by the due date(s), or within the prescribed period and a 'materially significant payment failure' refers to a payment failure which is likely to be of material significance to the regulator in the exercise of its functions.</p> <p>151 - Schemes should monitor pension contributions, resolve payment issues and report payment failures, as appropriate, so that the scheme is administered and managed in accordance with the scheme regulations and other legal requirements.</p>	Payment contributions are monitored monthly, transfers are also reconciled and other outstanding payments are invoiced so that debtor recovery policy covers non payment.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
G2	Do those processes and procedures include a contributions monitoring record to determine whether contributions are paid on time and in full?	152 - Adequate procedures and processes are likely to involve:- developing a record to monitor the payment of contributions- monitoring the payment of contributions- managing overdue contributions, and- reporting materially significant payment failures.156 - A contributions monitoring record will enable schemes to check whether contributions have been paid on time and in full, and, if they have not, provide a trigger for escalation for schemes to investigate the payment failure and consideration of whether scheme managers need to report to the regulator and, where relevant, members.157 - A contributions monitoring record should include the following information:- contribution rates- the date(s) on or before which employer contributions are to be paid to the scheme- the date by when, or period within which, the employee contributions are to be paid to the scheme- the rate or amount of interest payable where the payment of contributions is late.	Payment contributions are monitored monthly. Late payments are chased each month and a multi stage process implemented to address non payments.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
G3	Do those processes and procedures include monitoring payments against the contributions monitoring record on an ongoing basis?	<p>161 - Schemes should monitor contributions on an ongoing basis for all the membership categories within the scheme. Schemes should regularly check payments due against the contributions monitoring record.</p> <p>162 - Schemes should apply a risk-based and proportionate approach to help identify employers and situations which present a higher risk of payment failures occurring and which are likely to be of material significance and require the scheme manager to intervene.</p> <p>163 - Schemes should be aware of what is to be paid in accordance with the contributions monitoring record or other scheme documentation, which may be used by the pension scheme. Schemes should also have a process in place to identify where payments are late or have been underpaid, overpaid or not paid at all.</p> <p>164 - For schemes to effectively monitor contributions they will require access to certain information. Employers will often provide the payment information that schemes need to monitor contributions at the same time as they send the contributions to the scheme.</p> <p>165 - Schemes should have adequate internal controls in place to monitor the sharing of payment information between the employer, pension scheme and member. Where the necessary payment information is not automatically available or provided by employers, schemes should request the additional information they need. Schemes may not need to obtain payment information as a matter of course, only where it is required for effective monitoring.</p> <p>165 - Scheme managers must record and retain information on transactions, including any employer and employee contributions received and payments of pensions and benefits, which will support them</p>	All contributions are monitored against the rates payable as per the Fund's actuary Rates & Adjustment certificate. The Fund also checks payments against the payroll data provided by the employer to ensure reasonableness and that they are paying the correct rate. Any discrepancies are then picked up with the employer.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
		<p>in their administration and monitoring responsibilities.166 - Where the administration of scheme contributions is outsourced to a service provider, schemes should ensure that there is a process in place to obtain regular information on the payment of contributions to the scheme and a clear procedure in place to enable them to identify and resolve payment failures which may occur.</p>			

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
G4	Are these procedures regularly reviewed to ensure they are effective?	171 - The regulator recognises that a monitoring process based on information provided by employers may not be able to confirm deliberate underpayment or non-payment, or fraudulent behaviour by an employer. Schemes should review current processes or develop a new process which is able to detect situations where fraud may be more likely to occur and where additional checks may be appropriate.	The process was reviewed in 2015 to be more compliant with TPR requirements and a more formal structure put in place for the chasing of late payments. The process is also subject to audit by internal and external audit.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
G5	Do the Administering Authority's processes include managing overdue contributions in line with TPR's suggested approach?	<p>168 - When schemes identify or are notified of a problem, they should assess whether a payment failure has occurred before taking steps to resolve and, if necessary, report it. During their assessment, schemes should take into account:</p> <ul style="list-style-type: none"> - legitimate agreed payments made directly by an employer for scheme purposes, i.e. where the scheme has agreed that a contributions payment can be made late due to exceptional circumstances - legitimate agreed payment arrangements made between an employee and employer, i.e. where the employer has agreed that a contribution payment can be made late due to exceptional circumstances - contributions paid directly to a pension provider, scheme administrator or investment manager - any AVCs included with an employer's overall payment. <p>169 - Where schemes identify a payment failure, they should follow a process to resolve issues quickly. This should normally involve the following steps:</p> <ol style="list-style-type: none"> a. Investigate any apparent employer failure to pay contributions in accordance with the contributions monitoring record or legal requirements. b. Contact the employer promptly to alert them to the payment failure and to seek to resolve the overdue payment. c. Discuss it further with the employer as soon as practicable to find out the cause and circumstances of the payment failure. d. Ask the employer to resolve the payment failure and take steps to avoid a recurrence in the future. 	Yes as outlined above a process exists to address the late payments on contributions.	Reported quarterly to LPB & Pensions Committee	Ongoing

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
G6	Does the Fund maintain a record of any investigations and communications with employers?	170 - Schemes should maintain a record of their investigation and communications between themselves and the employer. Recording this information will help to provide evidence of schemes' effective monitoring processes and could help to demonstrate that the scheme manager has met the legal requirement to establish and operate adequate internal controls. It will also form part of the decision of whether or not to report a payment failure to the regulator and, where relevant, members.	Correspondence is saved by responsible administration section, however not consolidated as correspondence under the same single employer. As agreed part of Pensions Admin Strategy system development required to manage employer information.	As agreed part of Pensions Admin Strategy; implement a document management system to manage employer information.	2016/2018
G7	Do employers provide sufficient information to monitor contributions and is this in accordance with the LGPS regulations?	164 - Employers will often provide the payment information that schemes need to monitor contributions at the same time as they send the contributions to the scheme, which may be required under the scheme regulations. Payment information may include:• the employer and employee contributions due to be paid, which should be specified in the scheme regulations and/or other scheme documentation• the pensionable pay that contributions are based upon (where required), and• due date(s) on or before which payment of contributions and other amounts are to be made.	Yes, employers submit monthly return electronically to allow the checking of contributions.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
G8	Is there a satisfactory process in place to assess the materiality of any payment failures and ensure that those which are material are reported to the Regulator within a reasonable period?	<p>173 - Scheme managers must report payment failures which are likely to be of material significance to the regulator within a reasonable period, in the case of employee contributions; and as soon as reasonably practicable in the case of employer contributions</p> <p>174 - Where schemes identify a payment failure, they should attempt to recover contributions within 90 days from the due date or prescribed period having passed without full payment of the contribution.</p> <p>175 - While schemes are not expected to undertake a full investigation to establish materiality or investigate whether an employer has behaved fraudulently, schemes should ask the employer:- the cause and circumstances of the payment failure- what action the employer has taken as a result of the payment failure, and- the wider implications or impact of the payment failure.</p> <p>176 - When reaching a decision about whether to report, schemes should consider these points together and establish whether they have reasonable cause to report.</p> <p>177 - Having reasonable cause means more than merely having a suspicion that cannot be substantiated. Schemes should investigate the payment failure and use their judgement when deciding whether to report to the regulator.</p> <p>178 - Schemes may choose to take an employer's response to their enquiries at face value if they have no reason to believe it to be untrue or where their risk-based process indicates that there is a low risk of continuing payment failure. Where they receive no response, schemes may infer that an employer is unwilling to pay the contributions due.</p> <p>181 - Schemes should identify and report to the regulator, as appropriate, any payment failures that may not be of material significance taken individually, but</p>	<p>The Fund has now implemented a Breaches Policy which feeds into the monitoring of contributions. Officers already consider the reasons for non-payment of contributions and those outstanding are reviewed monthly. The tPR guidelines now provide a framework for considering a reportable event and the Breaches Policy now outlines the process for reporting.</p>		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
		<p>which could indicate a systemic problem. For example, an employer consistently failing to pay contributions by the due date or within the prescribed period, but paying within 90 days, may be due to inefficient scheme systems and processes. Schemes may also need to report payment failures that occur repeatedly and are likely to be materially significant to the regulator, depending on the circumstances.182 - Reporting payment failures of employer contributions as soon as 'reasonably practicable' means within a reasonable period from the scheme manager having reasonable cause to believe that the payment failure is likely to be of material significance to the regulator. Schemes should also consider whether it may be appropriate to report a payment failure of employer contributions to scheme members.183 - A reasonable period for reporting would be within ten working days from having reasonable cause to believe that the payment failure is likely to be of material significance. This will depend upon the seriousness of the payment failure and impact on the scheme. A written report should be preceded by a telephone call, if appropriate.184 - In the case of an employer failing to pay employee contributions to the pension scheme, if the scheme manager has reasonable cause to believe that the payment failure is likely to be of material significance to the regulator, the failure must be reported to the regulator and members within a reasonable period after the end of the prescribed period. A reasonable period for reporting to the regulator would be within ten working days and to members within 30 days of having reported to the regulator.</p>			

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
G9	If the administration of contributions outsourced to a service provider, is there a process in place to obtain regular information on the payment of contributions to the scheme?	167 - Where the administration of scheme contributions is outsourced to a service provider, schemes should ensure that there is a process in place to obtain regular information on the payment of contributions to the scheme and a clear procedure in place to enable them to identify and resolve payment failures which may occur.	N/A		
H1	Has an annual benefit statement been provided to all active members within the required timescales?	<p>188 - Scheme regulations must require scheme managers to provide an annual benefit information statement to each active member of a DB scheme established under the 2013 Act or new public body scheme. The statement must include a description of the benefits earned by a member in respect of their pensionable service.</p> <p>189 - The first statement must be provided no later than 17 months after the scheme regulations establishing the scheme come into force (i.e. 31st August 2015). Subsequent statements must be provided at least annually after that date.</p>	Yes - The Fund has successfully implemented a 'Year End' project plan resulting in 99% of member ABS being distributed by 31 August deadline.	Year End project plan in place for 2015/16 statements	Aug-16
H2	Do these meet the legal requirements in relation to format?	190 - Statements must also comply with HM Treasury directions in terms of any other information which must be included and the manner in which they must be provided to members.	Yes - Compliant with published national guidance.	Year End project plan in place for 2015/16 statements	Aug-16

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
H3	Has a benefit statement been provided to all active, deferred and pension credit members who have requested one within the required timescales?	<p>191 - Managers of a scheme must also provide a benefit statement following a request by an active, deferred or pension credit member of a DB scheme if the information has not been provided to that member in the previous 12 months before that request.</p> <p>193 - The information must be given as soon as practicable but no more than two months after the date the request is made</p>	Yes - as part of YE project plan all member categories have been issued with ABS within the required timescale.	Year End project plan in place for 2015/16 statements	Aug-16
H4	Does this meet the legal requirements in relation to format?	192 - These benefit statements must include information about the amount of benefits by reference to a particular date and how they are calculated. The full details depend on the type of member making the request.	Yes the legal requirements will be met as the LGA template was used as a model.		
H5	Has an annual benefit statement been provided to all members with AVCs within the required timescales?	194 - Managers of a scheme must provide a benefit statement to a member of a DC public service pension scheme, who is not an 'excluded person', within 12 months of the end of the scheme year. An 'excluded person' is a member or beneficiary whose present postal address and email address is not known to the scheme because the correspondence has been returned (in the case of postal correspondence) or has not been delivered (in the case of electronic correspondence).	Friends Life send the statements direct. Equitable Life send them to the Fund who mail these on. These were issued to the Fund in May 2015 and mailed out by the end of August (copies are also kept on		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
			the member records).		
H6	Do these meet the legal requirements in relation to format?	195 - The information which must be provided includes the amount of contributions (before any deductions are made) credited to the member during the immediately preceding scheme year, the value of the member's accrued rights under the scheme at a date specified by the managers of the scheme and a statutory money purchase illustration. The full detail of the information that must be provided is set out in the Disclosure Regulations 2013.	This is the responsibility of the AVC provider to ensure the statements contain all of the required information within the TPR code. Both friends Life & Equitable Life are aware of the requirements.		
H7	Is basic scheme information provided to all new and prospective members within the required timescales?	200 - Managers must disclose certain basic information about the scheme and the benefits it provides to a prospective member (if practicable to do so) or a new member. Where the manager has received jobholder information for the member or prospective member they must provide the information within a month of the jobholder information being received. Where they have not received jobholder information, they must provide the information within two months of the date the person became an active member of the scheme. 201 - Managers must also provide the information on	Each employer has been given the relevant information to issue to new and prospective members (available from APF website). The Fund currently doesn't have a process	To implement a check for employers to confirm information has been given to new and prospective members	Dec-16

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
		request to a relevant person within two months of the request being made, except where the same information was provided to the same person or trade union in the 12 months before the request.	for checking that employers are providing this information		
H8	Does this meet the legal requirements in relation to format?	200 - As per Regulation 6 of the Disclosure Regulations 2013.	Unsure on this as we don't have details of each employers process	To implement a check for employers to confirm information has been given to new and prospective members and in which format	Dec-16

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
H9	Is all other information provided in accordance with the legal timescales?	<p>196 - Under the Disclosure Regulations 2013, managers of a scheme must provide other information to members and others in certain circumstances (for example, on request). The Regulations set out the information which must be given, the timescales for providing such information and the methods that may be used. Not all information must be provided in respect of all public service pension schemes (there are some exemptions for specified public service schemes or according to the type of benefit offered), but information which scheme managers may need to provide includes: - information about the scheme that has materially altered - information about the constitution of the scheme- information about transfer credits- information about life styling (this requirement will not apply in respect of DB benefits in public service pension schemes)- information about accessing benefits, and- information about benefits in payment.197 - The detail of the information that must be provided to scheme members and others and any exemptions are set out in the Disclosure Regulations 2013. Managers must provide the required information, along with confirmation that members may request further information and the postal and email addresses to which a person should send those requests and enquiries</p>	<p>The majority of information is provided within the legal timescales however there are some enforced delays regarding transfers. Following Government Budget announcement in March 2016 - certain transfer have been put on hold pending revised transfer factors from GAD.The ability to meet the statutory timeframes is depends on the amount of work back logs. Recently there has been delays in processing</p>		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
			<p>some leaver information due to volume of leavers reported at year End. Plans are in place to address this. There has also been delays in aggregation of benefit work mainly resulting from pending guidance nationally. Plans are now in place to address the resulting build up of outstanding work.</p>		
H10	Is all other information provided in the format and methods required by law?	See above.	All information is currently sent to the person's last known postal address		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
H11	Where any information is only provided electronically (i.e. instead of any hard copy) does it comply with the legal requirements?	<p>203 - Generally, schemes may choose how they provide information to scheme members, including by post, electronically (by email or by making it available on a website) or by any other means permitted by the law. For benefit statements issued under the 2013 Act, HM Treasury directions may specify how the information must be provided. Where schemes wish to provide information required under the Disclosure Regulations 2013 by electronic means there are important steps and safeguards that must first be met. These include:- scheme members and beneficiaries being provided with the option to opt out of receiving information electronically by giving written notice to the scheme- managers being satisfied that the electronic communications have been designed: A) so that the person will be able to access and either store or print the relevant information and B) taking into account the requirements of disabled people- ensuring that members and beneficiaries who were members or beneficiaries of the public service pension scheme on 1 December 2010 (where the scheme had not provided information electronically prior to that date) has been sent a written notice (other than via email or website), informing them that: A) it is proposed to provide information electronically in the future and B) scheme members and beneficiaries may opt out of receiving information electronically by sending written notice.</p> <p>204 - Where schemes make information or a document available on a website for the first time, they must give notice (other than via a website) to the recipient. They must ensure that the notice includes:- a statement advising that the information is available on the website- the website address-</p>	N/a		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
		<p>details of where on the website the information or document can be read, and- an explanation of how the information or document may be read on the website.205 - When any subsequent information is made available on a website, managers of a scheme must give a notice (other than via a website) to recipients informing them that the information is available on the website. This notice will not be required where:- at least two documents have been given to the recipient by hand or sent to the recipient's last known postal address- each of those letters asks the recipient to give their electronic (email) address to the scheme and informs the recipient of their right to request (in writing) that information or documents are not to be provided electronically- a third letter has been given to the recipient by hand or sent to the recipient's last known postal address and includes a statement that further information will be available to read on the website and that no further notifications will be sent to the recipient and- the managers of the scheme do not know the recipient's email address and have not received a written request that information or documents are not to be provided to the recipient electronically.</p>			

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
H12	Does the Administering Authority aim to design and deliver communications in a way that ensures scheme members are able to engage with their pension provision?	207 - Schemes should design and deliver communications to scheme members in a way that ensures they are able to engage with their pension provision. Information should be clear and simple to understand as well as being accurate and easily accessible. It is important that members are able to understand their pension arrangements and make informed decisions where required.	Yes, Officers sit on the national communications working group. The Communication Strategy outlines a range of communications from website and digital communications, newsletters, presentations and pension clinics to allow all scheme members to engage with the Fund.		
H13	Does the Administering Authority use a tracing service?	208 - Schemes should attempt to make contact with their scheme members and, where contact is not possible, schemes should carry out a tracing exercise to locate the member and ensure that their member data are up-to-date.	Yes - APF uses Trace Smart & Heirtrace as tracing agencies.		
I1	Has the Administering Authority put in place an internal dispute resolution procedure?	213 - Scheme managers must make and implement dispute resolution arrangements that comply with the requirements of the law and help resolve pensions disputes between the scheme manager and a person with an interest in the scheme.	Yes		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
12	Does the Administering Authority's process highlight or consider whether a dispute is exempt?	214 - Section 50(9) of the 1995 Pensions Act states that a dispute is exempt if: <ul style="list-style-type: none"> - proceedings have commenced in a court or tribunal - the Pensions Ombudsman has started an investigation - it is prescribed by regulations made by the Secretary of State. 	Not specifically although this is done informally. Discussions have been had with Pensions Ombudsman regarding cases. Other areas have not arisen but need to be covered	Need to review application forms to make sure applicant gives details of other actions being taken	Sep-16

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
13	Does the information made available to applicants about the procedure clearly state the procedure and process to apply for a dispute to be resolved including:- who it applies to- who the specified person (stage 1) is - the timescales for making applications- who to contact with a dispute- the information that an applicant must include- the process by which decisions are reached?	215 - A person has an interest in the scheme if they:- are a member or surviving non-dependant beneficiary of a deceased member of the scheme- are a widow, widower, surviving civil partner or surviving dependant of a deceased member of the scheme- are a prospective member of the scheme- have ceased to be a member, beneficiary or prospective member or- claim to be in one of the categories mentioned above and the dispute relates to whether they are such a person.216 - Dispute resolution arrangements may require people with an interest in the scheme to first refer matters in dispute to a 'specified person' in order for that person to consider and give their decision on those matters. The specified person's decision may then be confirmed or replaced by the decision taken by the scheme manager after reconsideration of the matters.225 - If schemes decide to specify time limits, they should publish and make those time limits readily available to ensure that those with an interest in the scheme are aware that they must submit an application within a prescribed time limit.237 - Scheme managers must also provide the postal or email address and job title of the person to contact in order to make use of the internal dispute arrangements.239 - Schemes can decide what information they need from applicants to reach a decision on a disputed matter and how applications should be submitted. Schemes should ensure they make this information available to applicants.	Information is available on APF website or by request.The documentation and ewebsite details relates specifically to the requirements under the regulation as regards to who can applyThe process by which decisions are made are carried out in accordance withthe regulations.Adjudicators are required to specify the process which will be specifically related to the case	Employers will be informed of their responsibilities in this area	Dec-16

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
14	Has the Administering Authority ensured that employers who make first stage decisions also have IDRPs in place?		The IDRPs have been approved by Pension Committee Dec 15	The whole concept of Initial decisions and IDRPs cases will be explained to employers during this year	Dec-16
15	Are the timescales in the procedure adhered to including sending an acknowledgment on receipt of an application?	<p>Note - For the LGPS, the timescales must be in accordance with the LGPS regulations.231 - Applicants must be notified of the decision made by a scheme manager and specified person (where applicable) within a reasonable time period after the decision has been made.230 - The regulator recognises that the circumstances of each dispute are different and decision times may vary. Schemes should be satisfied that the time taken to reach a decision is appropriate to the situation and be able to demonstrate this, if necessary.232 - Schemes should provide the applicant with regular updates on the progress of their investigation. They should notify the applicant where the time period for a decision is expected to be shorter or longer than the reasonable time period and let them know when they are likely to receive an outcome.239 - Schemes should send an acknowledgement once an application has been received.</p>	Yes, a list of IDRPs cases are maintained by the Technical & Compliance Manager. The specific timescales are set out in the IDRPs. Applicants will be informed of progress and any delays with relevant explanation	All cases are monitored by APF whilst active	

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
16	Does the Administering Authority notify and advertise the procedure appropriately?	<p>236 -Information about the IDRPs must be communicated to:</p> <ul style="list-style-type: none"> - prospective members (if practicable) - scheme members who haven't already been given the information - members, or prospective members, when schemes receive jobholder information, or when a jobholder becomes an active member, in connection with automatic enrolment - certain people who request the information and haven't been given it in the previous 12 months <p>233 & 235 - The procedure should be:</p> <ul style="list-style-type: none"> - communicated in scheme documentation, e.g. a joining booklet - easily accessible, e.g. on the scheme website - within documents recording policy about the administration of the scheme. 	<p>Yes - on website link to complaints procedure in the contact us page. Information supplied in the brief guide to the scheme which is part of the Starter Pack and should be issued by Employer (or at least directed to the website) to all new members or employees that are auto-enrolled into the scheme</p> <p>All communications where a decision has been confirmed should give details of the procedure.</p>		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
17	Are the notification requirements in relation to TPAS and the Pensions Ombudsman being adhered to?	238 - In addition, scheme managers must provide information about TPAS and the Pensions Ombudsman at certain stages. Upon receiving an application for the resolution of a pension dispute, scheme managers (or the specified person) must make the applicant aware as soon as reasonably practicable that TPAS is available to assist members and beneficiaries of the scheme and provide contact details for TPAS. When notifying the applicant of the decision, scheme managers must also inform the applicant that the Pensions Ombudsman is available to investigate and determine complaints or disputes of fact or law relating to a public service pension scheme and provide the Pension Ombudsman's contact details.	Yes - on website All communications for decisions made by adjudicators are to include reference to both TPAS and the Pensions Ombudsman	Employers to be informed of their requirements	Dec-16
18	Does the Administering Authority regularly assess the effectiveness of its arrangements?	234 - Schemes should ensure that the effectiveness of the arrangements is assessed regularly and be satisfied that those following the process are complying with the requirements set, which includes effective decision making.	There is a review due after 1 year of the procedure being adopted to assess suitability	Undertake a review of the IDR process	Mar-17
19	Does the Administering Authority regularly assess the effectiveness where employers carry out a stage one process?	234 - See above - this is particularly important where the arrangements require employers participating in the pension scheme to carry out duties as part of the process, for example where schemes have implemented the two-stage procedure and employers are acting as the specified person for the first stage.	Employers are given assistance on the processes where required	Part of Employer training on IDR Once completed to then become part of any IDR reviews carried out	Dec-16

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
J1	Is the Administering Authority satisfied that those responsible for reporting reaches under the legal requirements and TPR guidance understand the requirements?	244 - Schemes should be satisfied that those responsible for reporting breaches are made aware of the legal requirements and this guidance. Schemes should provide training for scheme managers and pension board members. All others under the statutory duty to report should ensure they have a sufficient level of knowledge and understanding to fulfil that duty. This means having sufficient familiarity with the legal requirements and procedures and processes for reporting.	Yes - The Breaches Policy and Framework were approved in March 2016 by the Pension Fund Committee.		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
J2	Does the Administering Authority have appropriate procedures in place to meet their legal obligations for identifying and assessing breaches?	<p>245 - Identifying and assessing a breach of the law is important in reducing risk and providing an early warning of possible malpractice in public service pension schemes. Those people with a responsibility to report breaches, including scheme managers and pension board members, should establish and operate appropriate and effective procedures to ensure that they are able to meet their legal obligations. Procedures should enable people to raise concerns and facilitate the objective consideration of those matters. It is important that procedures allow reporters to decide within an appropriate timescale whether they must report a breach. Reporters should not rely on waiting for others to report.</p> <p>246 - Procedures should include the following features: - a process for obtaining clarification of the law around the suspected breach where needed- a process for clarifying the facts around the suspected breach where they are not known- a process for consideration of the material significance of the breach by taking into account its cause, effect, the reaction to it, and its wider implications, including (where appropriate) dialogue with the scheme manager or pension board- a clear process for referral to the appropriate level of seniority at which decisions can be made on whether to report to the regulator- an established procedure for dealing with difficult cases - a timeframe for the procedure to take place that is appropriate to the breach and allows the report to be made as soon as reasonably practicable- a system to record breaches even if they are not reported to the regulator (the record of past breaches may be relevant in deciding whether to report future breaches, for example it may reveal a systemic issue), and- a process for</p>	Yes - see policy		

No.	TPR Requirement	Notes from TPR Code	Officer Assessment	Action	Due Date
		identifying promptly any breaches that are so serious they must always be reported.			
J3	Are breaches being recorded in accordance with the agreed procedures?	246 - Procedures should include a system to record breaches even if they are not reported to the regulator (the record of past breaches may be relevant in deciding whether to report future breaches, for example it may reveal a systemic issue).	Yes - see policy		