

Bath & North East Somerset Council		
MEETING:	LOCAL PENSION BOARD - AVON PENSION FUND	
MEETING DATE:	4 March 2025	AGENDA ITEM NUMBER
TITLE:	The Pension Regulator’s General Code of Practice (TPR GCOP)	
WARD:	ALL	
AN OPEN PUBLIC ITEM		
List of attachments to this report:		
Appendix 1 – GCOP Assessment Summary		
Appendix 2 – APF Action Plan		
Appendix 2a – APF Action Plan – GCOP Appendices		

## 1 THE ISSUE

- 1.1 The purpose of this report is to summarise the Fund's view of compliance with The Pension Regulator's General Code of Practice and to provide an action plan to reach full compliance.

## 2 RECOMMENDATION

- 2.1 That the Board note the assessment and action plan.

## 3 FINANCIAL IMPLICATIONS

- 3.1 There are direct implications related to the Pension Board in connection with this report, however these are all currently within the planned budget for the operation of the Board.

## 4 REPORT

- 4.1 In March 2024 The Pensions Regulator combined various codes of practice into a single General Code of Practice which is applicable to most public and private occupational pension schemes, including the LGPS.
- 4.2 The purpose of this report is to summarise the Fund's view of compliance with the Code. There are a number of criteria which Funds must comply with in order to satisfy the requirements of the various sections of the Code. Appendix 1 sets out the requirements in more detail and records the findings from the assessment by Fund officers across all relevant subject areas.
- 4.3 Conducting the assessment against the requirements has allowed the Fund to create an action plan (attached as appendix 2), detailing owners and timescales with the aim of reaching compliance with the code over the next year.

- 4.4 The appendices referred to in the action plan can be found in appendix 2a. This provides further detail of the GCOP requirement. The full GCOP can be found by visiting TPR website <https://www.thepensionsregulator.gov.uk/en/document-library/code-of-practice>
- 4.5 In summary the Fund was compliant with app 70% of the requirements. The other 30% are partially compliant. Most actions are minor or are areas where significant work is already being undertaken. Eg – implementation of changes to internal controls, review and testing of the Business Continuity Plan. The key areas of the work will be in the following areas:
- Knowledge & Skills of Committee & Pension Board members
  - Internal Controls
  - Communications & disclosure of information to members
  - Review of record keeping and data improvement plan
  - Review of breaches policy
  - Business Continuity Plan
  - Monitoring Advisors & contracts
- 4.6 Progress against the action plan will be shared with Committee and Pension Board on a quarterly basis.

## **5 RISK MANAGEMENT**

- 5.1 The Avon Pension Fund Committee is the formal decision-making body for the Fund. As such it has responsibility to ensure adequate risk management processes are in place. It discharges this responsibility by ensuring the Fund has an appropriate investment strategy and investment management structure in place that is regularly monitored. In addition, it monitors the benefits administration, the risk register and compliance with relevant investment, finance and administration regulations.

## **6 EQUALITIES**

- 6.1 A proportionate equalities impact assessment has been carried out using corporate guidelines and no significant issues have been identified.

## **7 CLIMATE CHANGE**

- 7.1 The Fund is implementing a digital strategy across all its operations and communications with stakeholders to reduce its internal carbon footprint in line with the Council's Climate Strategy. The Fund acknowledges the financial risk to its assets from climate change and is addressing this through its strategic asset allocation to Paris Aligned Global Equities, Sustainable Equities and renewable energy opportunities. The strategy is monitored and reviewed by the Pensions Committee.

## **8 CONSULTATION**

- 8.1 The Report and its contents have been discussed with the Head of Pensions representing the Avon Pension Fund and the Director of Financial Services, Assurance & Pensions representing the administering authority.

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