

Appendix 4 - APF Action Plan

Avon Pension Fund

The following gives an overview of the current compliance position against the General Code of Practice, and a note of the immediate actions.

All requirements on this scorecard are currently rated as 'Partially met'.

Requirements	Current Status	Actions	Responsibility	Timescale	Comments
The Governing Body: Board Structure and Activities					
Members of governing bodies to display the characteristics shown in Appendix 1 .	In Progress	Mandatory training required for several members.	Governance and Risk Advisor	Dec-25	
The Governing Body: Knowledge and Understanding					
The governing body should regularly carry out an audit of its members' skills and experience to identify gaps and imbalances.	In Progress	Mandatory training required for several members.	Governance and Risk Advisor	Dec-25	
Members of the pension board can work towards completing TPR public service toolkit or equivalent learning programmes.					
To enable the pension board to ensure their knowledge and understanding is established and maintained, members of a governing body should comply with the points laid out in Appendix 6 .					
The Governing Body: Advisers and Service Providers					
Follow the processes set out for appointing advisers and service providers. (see Appendix 8 for more detail)	In Progress	Check SLAs agreed for all new contracts.	Fund officers	Mar-26	
Follow the processes set out for managing advisers and service providers. (see Appendix 9 for more detail)	In Progress	Review process for monitoring performance of service providers and engaging advisors and service providers, embedded Q2 2026 onwards.			
Follow the processes set out for replacing advisers and service providers. (see Appendix 10 for more detail)	In Progress	Internal procurement process to be reviewed to ensure contracts in place for all services via a compliant procurement route.			
The Governing Body: Risk Management					
The scheme manager should have in place internal controls, including: - The arrangements and procedures to be followed in the administration and management of the scheme - The systems and arrangements for monitoring that administration and management, and - Arrangements and procedures to be followed for the safe custody and security of the assets of the scheme.	In Progress	Embed 12 process improvements agreed with Simplify. Check other key processes and embed new controls if required	Head of Pensions	Mar-26	
When designing internal controls governing bodies should consider TPR expectations. (see Appendix 12 for more detail)	Complete	New projects and associated documents to be reviewed to include all TPR expectations. Go/No-Go checklist updated to cover internal controls.	Business Change Manager	Mar-26	
To maintain internal controls governing bodies should consider TPR expectations. (see Appendix 13 for more detail)	In Progress	Assurance reports required from Heywood.	Head of Pensions	Mar-26	Heywood assurance reports in place
The governing body should read and understand assurance reports provided by service providers to establish if the controls used by the organisations that they outsource various functions to are adequate. This will also include assurance reports produced by the scheme's investment manager and custodian. They should consider the scope of such reports and the degree to which these are applicable. For example, whether the reports cover the specific team or office providing services to the scheme.					
Governing bodies should consider having a continuity plan that meets the requirements of Appendix 14 .	Complete	New Business Continuity Plan to be completed and tested.	Governance and Risk Advisor	Apr-25	

Governing bodies should consider seeking independent legal advice, to help decide whether an actual or potential conflict of interest can be eliminated (and if so, the best way of achieving it).	Complete	Add requirement to conflicts of interest policy, applied only if a relevant case arises	Governance and Risk Advisor	Jun-25	
Administration: Scheme Administration					
Every scheme must operate internal controls which should include administration.	In Progress	Embed 12 process improvements agreed with Simplify. Check other key processes and embed new controls if required	Pensions Operations Manager	Mar-26	
To maintain proper administration, governing bodies should comply with the requirements set out in Appendix 22 .	In Progress	Complete new Business Continuity Plan and carry out test. Complete consistency review of procedure notes for all processes.	Pensions Operations Manager	Mar-26	Live test for BCP needed and review of BCP since going hosted in July 25. Target date moved to April 2026.
Administration: Information Handling					
The scheme manager is required to establish and operate internal controls, which are adequate for the purpose of securing that the scheme is administered and managed in accordance with the scheme rules, and with the requirements of the law. Governing bodies should make sure financial transactions are managed as part of their internal controls.	In Progress	Finish review of Payroll audit actions including Altair admin-payroll reconciliation and Altair admin to Agresso. And embed improvements into live process	Pensions Operations Manager	Mar-26	Move target date to April/May 26 due to new audit.
Governing bodies should meet the record keeping requirements set out in Appendix 26 .	In Progress	Review data improvement plan and record of Processing Activities. And embed required improvements.	Pensions Operations Manager	Mar-26	Moved target date to March 2026 to complete DIP and ROPA
Governing bodies may consider the record keeping requirements set out in Appendix 27 as best practice. [can we link to an appendix listing page 106 para 7]					
Governing bodies should retain records for as long as they are needed.	In Progress	Data Retention Policy to be reviewed. Deletion of Altair records to be reviewed. Employer data retention template to be rolled out again to employers.	Governance and Risk Advisor	Mar-26	Review in progress
Governing bodies should have appropriate processes in place for monitoring scheme data. (see Appendix 29 for full details)	Complete	Reporting capabilities are improving and we will therefore review the reporting of scheme specific data.	Pensions Operations Manager	Oct-25	Incorporated in new DIP. Tracing project for 2025 done and Data cleanse tool now live in Altair.
Governing bodies should have appropriate processes in place for reviewing scheme data. (see Appendix 30 for full details)					
Administration: IT & Cyber Security					
Governing bodies should take steps to make sure their service providers can prove they meet our expectations for maintaining IT systems as listed in Appendix 32 .	Complete	Finish the review of the business continuity plan and carry out a test. Finalise the reprocurement of the software contract.	Governance and Risk Advisor	Apr-25	
When assessing cyber risk governing bodies should follow the procedures set out in Appendix 33 .					
When managing cyber risk governing bodies should follow the procedures set out in Appendix 34 .					
Administration: Contributions					

Governing bodies should develop and maintain records for monitoring contribution payments to the scheme. This should include: contribution rates, date contributions are due, interest on late payments. (see Appendix 35 for full details)	In Progress	Review process for charging and recording interest for late payers.	Group Manager, Funding, Investment & Risk	Mar-26	Contribution rates are monitored and dates due + late payments are recorded on breaches spreadsheet. Admin Strategy has been updated to separately identify interest due on late payments and repeated late or inaccurate submission of contributions data. Hourly rate calculation spreadsheet has been devised for Accounts team use. Late payment interest policy still needs updating and to be formalised.
The governing body should review current processes to detect situations where fraud may be more likely to occur and where additional checks may be needed.	In Progress	Review process of new reconciliation data with iConnect team.	Group Manager, Funding, Investment & Risk	Mar-26	Employee contribution rates are checked for reasonableness compared to pensionable pay. Employer contribution rates paid are reconciled to the rates and adjustments certificate. Late payment of contributions are followed up with employers. Where the iConnect reconciliation doesn't match the payment, this is followed up promptly with the employer who is required to provide a separate reconciliation form. The success of this has been limited so we are investigating other routes for securing this information.
Communications and Disclosure: Information to Members					
The scheme manager should comply with the requirements of the Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013.	In Planning	Review the Disclosure of Information Regs to check compliance in all areas.	Technical and Compliance Advisor	Dec-25	
The governing body should follow the principles set out in the section entitled "General Principles for Member Communications". TPR expectations are listed in Appendix 37	In Progress	Individual letters to members will be reviewed as part of process reviews, starting with the new member letter.	Pensions Operations Manager	Mar-26	Date moved to March 2026 as letter review is delayed
Scheme managers should follow the principles set out in the section entitled "General Principles for Member Communications" when drafting benefit information statements. (see Appendix 38 for more detail)	Complete	Review of statements required to include McCloud data for 2025, plus Business Change Team to look at alternative ways to support members' understanding.	Technical and Compliance Advisor	Dec-25	
The term "reasonable period" in the phrase above should be construed as 3 months from leaving. Governing bodies should advise members where it is likely to take more than 3 months to provide the information.	In Progress	Double check KPIs to ensure all cases actioned within the three month period.	Pensions Operations Manager	Mar-26	Moved target date to March 2026 as S2's project ongoing
The governing body should give members 3 months to confirm if they wish to transfer their cash transfer sum and can extend this deadline at their discretion. If the member does not respond, the governing body may arrange to pay a contribution refund after a further month.	Complete	Check timescales and automatic refund.	Pensions Operations Manager	Dec-25	
Where a member elects for a cash transfer sum the governing body should pay it within 3 months but can extend in exceptional circumstances.	Complete	Tighter controls to be implemented for the process/potential review of process.	Pensions Operations Manager	Dec-25	
Communications and Disclosure: Public Information					
Scheme managers may consider how best to publish information, making use of the principles outlined in General principles for member communications. (See appendix 37)	Complete	TPR General Principles reviewed and incorporated into APF's updated Comms Policy.	Business Change Manager	Dec-25	

Scheme managers may also publish: - the employment and job title (where relevant) and any other relevant position each board members holds - details of the pension board recruitment process - who each pension board member represents - the full terms of reference for the pension board, including details of how it will operate - any specific roles and responsibilities of individual pension board members	Complete	As part of governance review check all correct	Governance and Risk Advisor	Jun-25	
Scheme managers should: - Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete - Ensure any out-of-date or incorrect information identified is updated as soon as possible and in any event, within one month	In Progress	APF Comms Policy reviewed and updated. Process development to monitor all published data in progress.	Business Change Manager	Mar-26	
There are further considerations the governing body should make in relation to the dispute resolution process. (see Appendix 40 for further details).	Complete	Review internal procedures & set out requirements in greater detail. Eg when a review is carried out and when advice is taken.	Technical and Compliance Advisor	Dec-25	
Reporting to TPR: Reporting Breaches					
Breaches of the law must be reported as soon as reasonably practicable.	Complete	Review breaches policy and process and add additional requirements	Governance and Risk Advisor	Dec-25	
There are other requirements placed on those running pension schemes to report to other bodies. Where the duty to report to another body coincides with the duty to report to TPR, the report to us should include details of the other bodies the matter has been reported to.					
If a scheme or an individual is at risk, for example where there has been dishonesty, the reporter should not take any actions that may alert those implicated that a report has been made. Similarly, reporters should not delay their report to TPR, to check whether any proposed solutions will be effective.					
Reports of late contribution payments should be made to us within 14 days of the trustees having reasonable cause to believe that a material payment failure exists. Members should be notified within 30 days of the report to TPR. When reporting to members, governing bodies should provide payment information that will enable them to understand what has been paid to the scheme and by whom.	In Planning			Mar-26	

Regulatory Requirement

TPR Requirement

Best Practice