

## 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
<b>The Governing Body: Board Structure and Activities</b>					
<b>The Governing Body: Knowledge and Understanding</b>					
The governing body should regularly carry out an audit of its members' skills and experience to identify gaps and imbalances.	In Progress	Mandatory training to be enforced as part of Fit for Future	Governance and Risk Advisor	Mar-27	
<b>The Governing Body: Advisers and Service Providers</b>					
Follow the processes set out for managing advisers and service providers. (see <b>Appendix 9</b> for more detail)	In Progress	Additional work required in monitoring contracts	Governance and Risk Advisor	Mar-27	
<b>The Governing Body: Risk Management</b>					
Governing bodies should consider having a continuity plan that meets the requirements of <b>Appendix 14</b> .	In Progress	Live test for BCP needed, review of BCP since going hosted. Pensions Payroll critical service testing.	Governance and Risk Advisor	Oct-26	Although new plan in place additional actions are now required
<b>Administration: Information Handling</b>					
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	Oct-26	
<b>Administration: Contributions</b>					
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 <b>Appendix 35</b> for full details)	In Progress	Late payment interest policy to be updated and formalised	Group Manager, Funding, Investment & Risk	Mar-27	
<b>Communications and Disclosure: Information to Members</b>					
The governing body should follow the principles set out in the section entitled "General Principles for Member Communications". TPR expectations are listed in <b>Appendix 37</b>	In Progress	Individual letters to members will be reviewed as part of process reviews, starting with the new member letter.	Pensions Operations Manager	Mar-27	
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-27	
<b>Communications and Disclosure: Public Information</b>					
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-27	
<b>Reporting to TPR: Reporting Breaches</b>					
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 Progress	Requirement to inform members where there has been a material breach in respect of payment of contributions to be added to process/breach policy	Governance and Risk Advisor	Mar-26	

Regulatory Requirement

TPR Requirement

Best Practice