



# TPR General code of practice

## Warwickshire Pension Fund - Scheme Assessment

Prepared for: Warwickshire County Council  
Staff and Pensions Committee  
Warwickshire Local Pension Board

Prepared by: Aon

Date: 26 November 2024

# Introduction






## TPR Code Compliance model

This report sets out how Warwickshire Pension Fund complies with the Pension Regulator's (TPR) General code of practice (the Code) in relation to the management of the Warwickshire Pension Fund which is part of the Local Government Pension Scheme (LGPS).

Note that the Code applies to governing bodies of all occupational, personal and Public Service Pension Schemes and therefore it is generic in nature. This document highlights all the key elements of the Code relevant to Public Service Pension Schemes and sets out whether Warwickshire County Council is compliant in each of the Code's modules. There may be a number of requirements relating to these elements that are specifically stipulated within LGPS legislation and it is not the purpose of this compliance model to consider that level of detail.

## Key

-  Compliant
-  Compliant in some but not all areas
-  Not currently compliant

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**PC** Pension Committee (or equivalent)

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**PB** Local Pension Board

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**TPR** The Pensions Regulator

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**LGPS** Local Government Pension Scheme

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**Code** TPR's General code of practice

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# The governing body

# The governing body – at a glance



## Board Structure and activities

**Fully compliant in 0 out of 5 modules**



2 questions are red and 9 questions are amber out of 30 questions.

## Knowledge and understanding requirements

**Fully compliant in 0 out of 2 modules**



No questions are red and 9 questions are amber out of 20 questions.

## Essential actions

- Include information on Induction Training when Training Policy is next reviewed
- Recruitment and retention policy to include PB appointments
- Recruitment and retention policy to include details on inclusion / diversity
- Recruitment and retention policy to include details on inclusion / diversity
- Consider what actions can be taken if members repeatedly refuse to complete / engage. Currently some wording in TOR on this for PB
- Recruitment and retention policy to include details on succession planning
- Consider creating a specific resignation and removal policy or incorporating elsewhere
- Need to document process for appointment of PB chair
- Need to document process for appointment of a new PB chair
- Consider adding how we review the skills and behaviours of the Chair of PC/PB to Fund Recruitment and Retention policy
- Update TOR to quarterly officially for PB

## Advisers and service providers

**Fully compliant in 0 out of 1 module**



No questions are red and 5 questions are amber out of 19 questions.

## Risk Management

**Fully compliant in 1 out of 6 modules**



4 questions are red and 8 questions are amber out of 50 questions.

## Comments

## Scheme governance

**Fully compliant in 0 out of 1 module**



No questions are red and 4 questions are amber out of 24 questions.

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

# The governing body - changes



## Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

### Board structure and activities

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

### Knowledge and understanding requirements

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

### Advisers and service providers

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

### Risk management

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

### Scheme governance

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

# The governing body



## Board structure and activities

### Essential Actions

Module	Question	Action
1 Role of the governing body	3	Include information on Induction Training when Training Policy is next reviewed
2 Recruitment and appointment to the governing body	1	Recruitment and retention policy to include PB appointments
3 Recruitment and appointment to the governing body	2	Recruitment and retention policy to include details on inclusion / diversity
4 Recruitment and appointment to the governing body	3	Recruitment and retention policy to include details on inclusion / diversity
5 Recruitment and appointment to the governing body	4	Consider what actions can be taken if members repeatedly refuse to complete / engage. Currently some wording in TOR on this for PB
6 Recruitment and appointment to the governing body	5	Recruitment and retention policy to include details on succession planning
7 Recruitment and appointment to the governing body	6	Consider creating a specific resignation and removal policy or incorporating elsewhere
8 Appointment and role of the chair	1	Need to document process for appointment of PB chair
9 Appointment and role of the chair	2	Need to document process for appointment of a new PB chair
10 Appointment and role of the chair	4	Consider adding how we review the skills and behaviours of the Chair of PC/PB to Fund Recruitment and Retention policy
11 Meetings and decision-making	2	Update TOR to quarterly officially for PB
12 Meetings and decision-making	8	Consider drafting detailed Fund specific Scheme of Delegation
13 Meetings and decision-making	9	Ensure all declared conflicts of interest are populated on ModGov too
14 Remuneration and fee policy	1	Consider drafting a Remuneration policy specific to Fund

### Other Actions

Module	Question	Action
1 No Actions		

## Knowledge and understanding requirements

### Essential Actions

Module	Question	Action
1 Knowledge and understanding	5	Ensure Induction training called out separately in training policy
2 Governance of knowledge and understanding	1	Consider how to evidence that members are meeting competencies
3 Governance of knowledge and understanding	2	Include induction training in training policy
4 Governance of knowledge and understanding	4	Consider how to plan for developing training for PB to meet any skills gaps
5 Governance of knowledge and understanding	5	Mention in induction training bit in policy
6 Governance of knowledge and understanding	7	Consider how to plan for developing training for PB to meet any skills gaps
7 Governance of knowledge and understanding	8	Consider how the balance of skills and experience of PC can be demonstrated
8 Governance of knowledge and understanding	9	Include induction training in training policy
9 Governance of knowledge and understanding	11	Consider how to plan for developing training for PC to meet any skills gaps
10 Governance of knowledge and understanding	12	Mention in induction training bit in policy
11 Governance of knowledge and understanding	14	Consider how to plan for developing training for PC to meet any skills gaps

### Other Actions

Module	Question	Action
1 No Actions		

## Advisers and service providers

### Essential Actions

Module	Question	Action
1 Managing advisers and service providers	1	Consider putting a policy in place for making appointments of advisers and service providers
2 Managing advisers and service providers	2	Consider creating a Fund specific policy for selecting advisers and service providers to clearly evidence this
3 Managing advisers and service providers	3	Consider creating a Fund specific policy for selecting advisers and service providers to clearly evidence this
4 Managing advisers and service providers	4	Consider creating a Fund specific policy for selecting advisers and service providers to clearly evidence this

5	Managing advisers and service providers	6	Consider creating a Fund specific policy for selecting advisers and service providers to clearly evidence this
6	Managing advisers and service providers	10	Consider creating a Fund specific policy for selecting advisers and service providers to clearly evidence this
7	Managing advisers and service providers	11	Consider creating a Fund specific policy for selecting advisers and service providers to clearly evidence this

### Other Actions

Module	Question	Action
1	No Actions	

## Risk management

### Essential Actions

Module	Question	Action	
1	Internal controls	2	Consider including the process for escalation when Risk Policy next reviewed
2	Internal controls	6	Consider how to evidence that our internal controls include the expectations in the Code
3	Assurance reports on internal controls	3	Consider how to get assurance reporting of internal controls from all service providers
4	Scheme continuity planning	5	Consider how to get assurance on business continuity arrangements of all service providers as part of Data/Asset mapping
5	Scheme continuity planning	6	Get a process in place for service providers business continuity arrangements to be consistently reviewed
6	Scheme continuity planning	10	Consider resourcing / budget in the event of a business continuity situation
7	Scheme continuity planning	11	Consider resourcing / budget in the event of a business continuity situation
8	Scheme continuity planning	12	Consider resourcing / budget as part of Business Planning exercise
9	Conflicts of interest	5	Ensure register of interests is published on Modgov
10	Conflicts of interest	6	Ensure advisers are included in the Conflicts of Interest policy
11	Conflicts of interest	7	Ensure all service providers have their own policies for managing conflicts
12	Conflicts of interest	8	Reference specific code wording is included in the next conflicts of Interest policy review
13	Conflicts of interest	9	Include details of how new PB members demonstrate they do not have a conflict as part of Recruitment and Retention policy
14	Conflicts of interest	11	Ensure register of interests is published on Modgov

### Other Actions



<b>Module</b>	<b>Question</b>	<b>Action</b>
1 No Actions		

## **Scheme governance**

### **Essential Actions**

<b>Module</b>	<b>Question</b>	<b>Action</b>
1 No Actions		

### **Other Actions**

<b>Module</b>	<b>Question</b>	<b>Action</b>
1 No Actions		

# The governing body



## Modules

### Board structure and activities

- Role of the governing body (1)
- Recruiting and appointment to the governing body (2,6)
- *Arrangements for member-nominated trustee appointments (7)*
- Appointment and role of the chair (5)
- Meetings and decision-making (1)
- Remuneration and fee policy (4)

### Knowledge & understanding requirements

- Knowledge and understanding (3,6)
- Governance of knowledge and understanding (3,6)

### *Value for scheme members (DC only)*

- *Value for members (7)*

#### Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

(1) Applies

(2) Mostly applies

(3) Partially applies

(4) Good practice

(5) Mostly good practice

(6) Partially good practice

(7) Does not apply

### Advisers and service providers

- Managing advisors and service providers (4)

### Risk management

- Identifying, evaluating and recording risks (1)
- Internal controls (1)
- Assurance reports on internal controls (1)
- Scheme continuity planning (4)
- Conflicts of interest (3,6)
- Own risk assessment (4)
- *Risk management function (7)*

### Scheme governance

- Systems of governance (4)



# The governing body

## Board structure and activities

### Role of the governing body



**Notes:**

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Does the Fund have a Pension Committee (or equivalent) (PC) which fulfils the role of scheme manager / administering authority and is established in accordance with legislation within the appropriate constitution (or equivalent)?	Yes	Green	Grey
2	Has the Scheme Manager (i.e. the Administering Authority) established a Local Pension Board (PB) which meets the requirements of the LGPS regulations?	Yes	Green	Grey
3	Upon joining the PC (or equivalent) or PB, are members made aware and receive training about, the expected behaviours and standards of a member of PC / PB as set out in the Code (see paragraph 6 of this module)?	Partially	Yellow	Grey
4	Are the roles and responsibilities of members of the PC (or equivalent) and PB clearly set out in scheme documentation such as the Governance Policy?	Yes	Green	Grey

# The governing body



## Board structure and activities

### Recruitment and appointment to the governing body

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- Notes:**
- **Mostly applies / Partially good practice.** Whilst most of this module applies for Public Service Pension Schemes we note that it includes a paragraph (paragraph 3) which refers to good practice. Therefore we have shown the questions relating to this paragraph as being good practice only. Note that paragraph 6 doesn't apply for Public Service Pension Schemes.
  - **When considering this module, you should also refer to the Pension Regulator's guidance on Equality, Diversity and Inclusion (on TPR website see Scheme management detailed guidance / Governing body / Equality, diversity and inclusion (EDI)). We recommend that further action is taken to review this guidance to ensure that you are following it.**

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have processes and policies in place for the appointment of members to the PC (or equivalent) and PB, covering the features set out in the Code (see paragraph 5 of this module)?	Partially	Yellow	Grey
2	Do you have processes in place to ensure recruitment practices of members to the PC (or equivalent) and PB are inclusive?	Partially	Yellow	Grey
3	Do you regularly review membership of the PC (or equivalent) and PB to ensure a diverse spread of members with varied technical skills and experience?	Partially	Yellow	Grey
4	Are members of PC (or equivalent) and PB asked to complete a skills gap analysis to ensure any gaps can be addressed over time?	Yes	Green	Grey
5	Does succession planning take place (to the extent it is able to)?	No	Red	Grey

Question ID	Question	Answer	Current Score	Previous Score
6	Do you have a resignation and removal policy setting out who can remove a member of the PC (or equivalent) and PB and the circumstances and processes to follow?	Partially		
7	Do you have a process for ensuring that appropriate representation as required by the LGPS regulations / local government legislation is maintained?	Yes		

# The governing body

## Board structure and activities

### Appointment and role of the chair



- Notes:**
- Mostly good practice. Our interpretation is that this module is good practice for Public Service Pension Schemes, other than paragraphs 4 and 5 which do not apply for Public Service Pension Schemes.
  - This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Is the process for the appointment of the Chair of the PC (or equivalent) and PB robust and clearly documented?	Partially	Yellow	Grey
2	Is there a process in place for the appointment of a new Chair of the PC (or equivalent) and PB upon resignation or removal?	No	Red	Grey
3	Are the Chairs of the PC (or equivalent) and PB made aware of, or provided training about, the skills and behaviours that they should demonstrate as set out in the Code (see paragraph 6 of this module)?	Yes	Green	Grey
4	Do you carry out regular analysis of the skills and behaviours of the Chair of the PC (or equivalent) and PB to ensure they are meeting the requirements in the Code (see paragraph 6 of this module)?	Partially	Yellow	Grey

# The governing body

## Board structure and activities

### Meetings and decision-making



#### Notes:

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Does the PC (or equivalent) meet regularly (e.g. at least quarterly)?	Yes		
2	Does the PB meet regularly? (e.g. quarterly)?	Yes		
3	Do you ensure that the meeting and decision making arrangements for the PC (or equivalent) and PB adhere to requirements in the relevant local authority legislation, the LGPS regulations and the relevant areas of your Constitution?	Yes		
4	Are formal minutes prepared relating to all PC (or equivalent) and PB meetings which clearly document the date, time, place of meeting, those present, absentees, decisions taken, and decisions taken outside of meetings (including date decision was taken and those who participated in the decision)? (See the Public Service Record Keeping Regulations for PB requirements).	Yes		
5	When planning and running meetings, does the PC (or equivalent) and PB meet in accordance with the meeting processes, procedures and decision-making set out in the Code (see paragraph 6a to k of this module)?	Yes		
6	Are decisions at PC (or equivalent) and any sub-committee meetings made in accordance with LGPS legislation and their Terms of Reference?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
7	Are the matters considered at PB meetings in accordance with LGPS legislation and their Terms of Reference?	Yes		
8	Is there a clearly documented Scheme of Delegation which appropriately cover pension fund matters, including who can make decisions, and are records kept of all decisions (including background information and advice) made under these delegations?	Partially		
9	Are records of all declared conflicts of interests maintained?	Yes		
10	Are records of decisions retained for as long as they are needed?	Yes		
11	Does the PC (or equivalent) and PB have a clear process for determining what information should be made public and what information should not, in line with legal requirements including local authority legislation?	Yes		



# The governing body

## Board structure and activities

### Remuneration and fee policy



**Notes:**

- Good practice
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Is there a written remuneration and fee policy in place for the PC (or equivalent), PB officers and any external bodies who effectively run the scheme?	Partially		
2	If Yes, is there a process in place for this to be reviewed at least every three years?	N/A		
3	Does the remuneration policy provide the rationale for the levels of remuneration (but noting that TPR have confirmed it does not have to set out levels of remuneration paid) and include measures taken to mitigate conflicts of interest?	N/A		
4	Does your remuneration and fee policy cover all areas set out in the Code (see paragraph 3 of this module)?	N/A		

# The governing body



## Knowledge and understanding requirements

### Knowledge and understanding

- Notes:**
- Partially applies / Partially good practice. For Public Service Pension Schemes this module is a requirement for Pension Board members and good practice for scheme managers (or their delegates) (i.e. Pensions Committee (or equivalent)).
  - This module forms part of an Effective System of Governance.
  - When considering this module, you should also refer to the CIPFA Knowledge and Skills Code of Practice and Frameworks.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you maintain a list of items that all members of the PB should be familiar with which covers the key items set out in the Code (paragraphs 9 to 15 of this module) where relevant to the LGPS?	Yes	5	0
2	If yes, is this list regularly reviewed (i.e. at least every three years or when new regulations / guidance are published)?	Yes	5	0
3	Do you maintain a list of items that all members of the PC (or equivalent) (and any sub-committee) should be familiar with which covers the key items set out in the Code (paragraphs 9 to 15 of this module) where relevant to the LGPS?	Yes	5	0
4	If yes, is this list regularly reviewed (i.e. at least every three years or when new regulations / guidance are published)?	Yes	5	0
5	Are the key items set out in the Code (across paragraphs 9 to 15 of this module where relevant to the LGPS) covered in your training plan, including induction training, and Knowledge and Skills Policy?	Partially	3	0

Question ID	Question	Answer	Current Score	Previous Score
6	Do you have a Knowledge and Skills Policy (or equivalent) that's regularly updated (i.e. every 3 years) which covers members of the PC (or equivalent), PB and Fund officers covering the expectations of the Code and in accordance with the CIPFA Knowledge and Skills Frameworks?	Yes		

# The governing body



## Knowledge and understanding requirements

### Governance of knowledge and understanding

- Notes:**
- Partially applies / Partially good practice. For Public Service Pension Schemes this module is a requirement for Pension Board members. We note that there is no reference in this module to scheme managers (or their delegates) in relation to Public Service Pension Schemes. However, given the CIPFA Knowledge and Skills Code of Practice and Frameworks referred to below we would suggest that it is good practice to also apply the principles set out in this module to the Pension Committee (or equivalent). We have therefore included some good practice questions in this module shown in orange.
  - This module forms part of an Effective System of Governance.
  - When considering this module, you should also refer to the CIPFA Knowledge and Skills Code of Practice and Frameworks.

Question ID	Question	Answer	Current Score	Previous Score
1	Does the PB have a balance of skills and experience, and is it able to demonstrate and apply these skills and experience?	Partially	Yellow	Grey
2	Are new members of PB given appropriate induction training to ensure they can demonstrate the basic level of required knowledge within six months of their appointment?	Partially	Yellow	Grey
3	Do you carry out a regular review (i.e. annually) of any gaps in knowledge and skills within the PB to ensure appropriate training is provided to address these gaps?	Yes	Green	Grey
4	Do you maintain training and development plans for the PB to ensure knowledge is kept up to date, covering both individual and collective knowledge?	Partially	Yellow	Grey

Question ID	Question	Answer	Current Score	Previous Score
5	Are all PB members made aware of the required investment in time for learning and development, in addition to other duties?	Yes		
6	Do you consider and provide a range of ways for PB members to acquire knowledge?	Yes		
7	Do you retain details of training undertaken (both internally and externally) by individual members of PB, including setting out steps taken to address any gaps and meet legal requirements?	Partially		
8	Does the PC (or equivalent) have a balance of skills and experience, and is it able to demonstrate and apply these skills and experience?	Partially		
9	Are new members of PC (or equivalent) given appropriate induction training to ensure they can demonstrate the basic level of required knowledge within six months of their appointment?	Partially		
10	Do you carry out a regular review (i.e. annually) of any gaps in knowledge and skills within the PC (or equivalent) to ensure appropriate training is provided to address these gaps?	Yes		
11	Do you maintain training and development plans for the PC (or equivalent) to ensure knowledge is kept up to date, covering both individual and collective knowledge?	Partially		
12	Are all PC (or equivalent) members made aware of the required investment in time for learning and development, in addition to other duties?	Yes		
13	Do you consider and provide a range of ways for PC (or equivalent) members to acquire knowledge?	Yes		
14	Do you retain details of training undertaken (both internally and externally) by individual members of PC (or equivalent), including setting out steps taken to address any gaps and meet legal requirements?	Partially		

# The governing body

## Advisers and service providers

### Managing advisers and service providers



**Notes:**

- Good practice
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have agreed and documented policies for making appointments to the Fund?	Yes	1	0
2	Is the policy for selecting advisers and service providers approved by the PC (or equivalent) and reviewed at least every three years?	Yes	1	0
3	Do you ensure sufficient resources and time is allocated to procurement activity?	Yes	1	0
4	Are you familiar with the terms & conditions of contracts with service providers, including any national frameworks where relevant, and understand the scope of responsibilities performed by service providers and advisers?	Yes	1	0
5	Do you assess service providers, including undertaking due diligence, as part of the appointment process?	Yes	1	0
6	Do you clearly set out the roles and responsibilities of service providers and advisers as part of the appointment process?	Yes	1	0
7	Do you have agreed delegations and procedures for referral (i.e. asking for work to be carried out) with service providers?	Yes	1	0

Question ID	Question	Answer	Current Score	Previous Score
8	Is there an agreed process in place for ongoing management of advisers, recording decisions taken, as well as escalation points?	Yes		
9	Are there policies and processes in place for identifying and managing conflicts of interest?	Yes		
10	Do you consider and understand data protection requirements for any information shared with or handled by your service providers?	Yes		
11	Are you aware of the obligations, professional conduct rule and whistleblowing requirements placed on some advisers?	Partially		
12	Do you ensure that service providers are able to demonstrate that they have adequate internal controls relating to the services they provide?	Partially		
13	Do you regularly assess and record performance of service providers against key performance indicators and service level agreements, and have in place a process for ensuring improvements are made where poor service is identified?	Yes		
14	Do you carry out a market review for all relevant service providers?	Yes		
15	Do you work with service providers to understand expected scheme or legal changes and ensure they are able to provide the necessary resources to deal with the changes?	Yes		
16	Do you have business continuity plans in place to enable continuous and consistent provision of services in the event of a change in service provider or provider failure?	Partially		
17	When considering replacing a service provider, do you consider the interests of the scheme members?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
18	When replacing a service provider, do you understand the impact of the terms and conditions of contracts in place, including fees or penalties and procedures for releasing relevant information?	Partially		
19	When replacing service providers and advisors, do you plan transition effectively, setting out the risks, key steps, actions, decisions, owners and timescales, including how costs will be met and how risks will be mitigated?	Partially		



# The governing body



## Risk management

### Identifying, evaluating and recording risks

- Notes:**
- Applies
  - This module forms part of an Effective System of Governance.
  - When considering this module, you should also refer to the CIPFA Managing Risk in the LGPS guidance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a Risk Management Policy approved by the PC (or equivalent)?	Yes		
2	If Yes, is your policy reviewed at least every 3 years and is it currently up to date, accurate, relevant and in accordance with LGPS Regulations?	Yes		
3	Do you have a risk register to record all risks identified and action taken?	Yes		
4	Do you have an agreed process for regularly considering and identifying risks which is integrated into the day to day management of the Fund / scheme and which includes reviewing your risk register at least quarterly?	Yes		
5	Do you consider all of the following types of risks alongside appropriate risk mitigation techniques:			
5 a	▪ scheme investments, including asset-liability management	Yes		
5 b	▪ operation resilience, including for service providers	Yes		
5 c	▪ insurances, compensation funds, and other risk-mitigation techniques	Yes		
5 d	▪ environmental, social, and governance risks	Yes		
5 e	▪ scheme funding and covenant strength	Yes		
5 f	▪ the risk of fraud	Yes		
5 g	▪ failure to comply with the law and / or scheme rules	Yes		

Question ID	Question	Answer	Current Score	Previous Score
5 h	▪ poor record-keeping, poor administration, and IT and database failures	Yes		
5 i	▪ cyber security risks	Yes		
5 j	▪ governance and decision making, or existing controls are not operating to the standard required by pensions legislation	Yes		
5 k	▪ actual or potential conflicts of interest	Yes		
6	Does the PC (or equivalent) and PB do the following at each meeting:			
6 a	▪ identify and evaluate risks	Yes		
6 b	▪ review internal controls and risk management	Yes		
7	Do your processes for evaluating risks meet the expectations set out in the Code (see paragraph 7 in this module)?	Yes		
8	Do your processes for recording and updating risk records meet the expectations set out in the Code (see paragraph 8 in this module)?	Yes		
9	Do you have clear ownership of who monitors risks and addresses risks (both within the Fund and with third parties)?	Yes		
10	Do you get information from relevant parties (e.g. investment managers, administrator) at least quarterly to allow you to update the Risk Register?	Yes		
11	In allocating roles and responsibilities, do you:			
11 a	▪ have processes to monitor risk and issues between meetings (particularly if action is the responsibility of third-party)?	Yes		
11 b	▪ receive information from relevant parties to update the risk register (quarterly)?	Yes		
11 c	▪ recognise when professional advice is required?	Yes		

# The governing body

## Risk management

### Internal controls



- Notes:**
- Applies
  - This module forms part of an Effective System of Governance.
  - When considering this module, you should also refer to the CIPFA Managing Risk in the LGPS guidance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you maintain a risk management framework that clearly identifies the internal controls in place or required for mitigating risks?	Yes	Green	Grey
2	When developing your internal controls, do you ensure there is appropriate separation of duties, and that they include the processes for escalation and decision making?	Partially	Yellow	Grey
3	Do the internal controls ensure you administer and manage the Fund / scheme in accordance with the requirements of the law and relevant regulations?	Yes	Green	Grey
4	Are your internal controls all documented?	Yes	Green	Grey
5	Do you have a system to review internal controls in place regularly (e.g. at least annually, upon substantial changes to the Fund / scheme or if a control is not working to the standard required by the law)?	Yes	Green	Grey
6	When designing internal controls have you considered the expectations set out in the Code (see paragraph 17 in this module)?	Partially	Yellow	Grey

# The governing body

## Risk management

### Assurance reports on internal controls

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**Notes:**  
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Do you carry out an annual statutory audit (external audit) as part of the preparation of your Annual Report and Accounts?	Yes	Green	Grey
2	Do you engage with your internal auditor to suggest specific areas of concern that could be covered by an audit?	Yes	Green	Grey
3	Do you receive and consider assurance reporting from relevant parties (e.g. by service providers including investment managers and custodians), if they are available?	Partially	Yellow	Grey

# The governing body

## Risk management

### Scheme continuity planning



- Notes:**
- Good practice. However, we note that it is a legal requirement for Public Service Pension Schemes to establish and operate internal controls and we would expect that scheme continuity planning would be included within this.
  - This module forms part of an Effective System of Governance.

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

Question ID	Question	Answer	Current Score	Previous Score
8	Does your Business Continuity approach ensure key member processes are prioritised?	Yes		
9	Does your BCP ensure continued access to resources, service and communications with key parties?	Partially		
10	Have you considered timeframes to bring new resources on board in a business continuity situation?	No		
11	Do you have contingency plans to address any under resourcing issues?	Partially		
12	Do you undertake Annual Business Planning to identify additional resource requirements each year for projects / non business as usual work?	Partially		

# The governing body

## Risk management

### Conflicts of interest



- Notes:**
- Partially applies / Partially good practice. Our interpretation is that the internal control elements of this module apply to Public Service Pension Schemes (paragraph 3a which then refers to paragraphs 6 to 8), along with the requirements for Pension Boards (paragraphs 22 to 24). We have highlighted these paragraphs bold. The remaining paragraphs are good practice for Public Service Pension Schemes (as referenced in paragraph 3b). We have highlighted these paragraphs orange.
  - This module forms part of an Effective System of Governance.
  - The internal control requirements under section 249B of the Pensions Act 2004 are highlighted in the Code in relation to this module. If any elements are highlighted as good practice only, you should still ensure that you have the appropriate internal controls in place.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a Fund-specific conflicts of interest policy which is published covering persons involved in the governance and management of the Fund (including PC (or equivalent), PB and officers)?	Yes	1	0
2	If yes, is this policy regularly reviewed (e.g. every 3 years) and is it currently up to date, accurate, relevant and in accordance with LGPS Regulations?	Yes	1	0
3	Is training on the requirements of this policy provided to PC (or equivalent), PB, officers and shared with advisers?	Yes	1	0
4	Does the PC (or equivalent) and PB consider potential and actual conflicts at every meeting, including in relation to specific agenda items and record these considerations?	Yes	1	0

Question ID	Question	Answer	Current Score	Previous Score
5	Do you maintain a register of interests?	Yes	Green	Grey
6	Do you have a process to ensure that all new PC (or equivalent), PB members and advisers make a declaration of conflicts of interest on appointment?	Yes	Green	Grey
7	Have you ensured that your advisers have their own policy for managing potential conflicts which may arise?	Don't know	Red	Grey
8	Does your Fund-specific conflicts of interest policy reflect relevant expectations of the Code (see paragraphs 9 to 19 of this module)?	Partially	Yellow	Grey
9	Do you have a process to ensure that a prospective member of the PB does not have a conflict of interest?	No	Red	Grey
10	Do you have processes to ensure that you remain satisfied that none of the members of the PB have a conflict of interest?	Yes	Green	Grey
11	Do you ensure that the register of interests and other relevant documents are circulated to the PB for ongoing review and are published?	Yes	Green	Grey



# The Governing Body



## Risk management

### Own risk assessment

**Notes:**

- Good practice

Question ID	Question	Answer	Current Score	Previous Score
1	Have you carried out an own risk assessment (ORA) of the effectiveness of the system of governance and the management of risks and controls?	No		
2	Has the ORA been carried out in a manner that includes an element of independence (e.g. a third party, internal audit or persons less involved in day-to-day governance / management of the Fund / scheme)?	N/A		
3	Is the ORA documented in writing, shared with members of the PC (or equivalent) and PB and officers and signed off by the Chair of the PC (or equivalent)?	N/A		
4	Is the ORA dated, is it recorded when the next ORA will be prepared, and any interim reviews anticipated?	N/A		
5	Does the ORA consider how it has assessed the effectiveness of each of the policies and procedures covered by it?	N/A		
6	Does your ORA include whether you consider the operation of the policies and procedures to be effective and why?	N/A		
7	Does the ORA include consideration of the effectiveness of, and risks arising from each element set out in paragraphs 14 to 19 of this module (e.g. policies for the governing body, risk management policies, investment, additional investment matters for defined benefit schemes, administration and payment of benefits)?	N/A		

# The Governing Body

## Scheme governance

### Systems of governance



#### Notes:

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

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

Question ID	Question	Application of modules that form part of an ESOG for Public Service Pension Schemes	RAG score	Answer	Current Score	Previous Score
1	Do you wholly or mainly meet the requirements of the Role of the governing body module (see paragraph 13 in relation to Management of activities)?	Applies	88%	Yes		
2	Do you wholly or mainly meet the requirements of the Meetings and decision-making module (see paragraph 13 in relation to Management of activities)?	Applies	95%	Yes		
3	Do you wholly or mainly meet the requirements of the Remuneration and fee policy module (see paragraph 13 in relation to Management of activities)?	Good practice	88%	Partially		

Question ID	Question	Application of modules that form part of an ESG for Public Service Pension Schemes	RAG score	Answer	Current Score	Previous Score
4	Do you wholly or mainly meet the requirements of the Knowledge and understanding module (see paragraph 13 in relation to Management of activities)?	Partially applies / Partially good practice	92%	Yes		
5	Do you wholly or mainly meet the requirements of the Governance of knowledge and understanding module (see paragraph 13 in relation to Management of activities)?	Partially applies / Partially good practice	71%	Yes		
6	Do you wholly or mainly meet the requirements of the Dispute resolution procedures module (see paragraph 13 in relation to Management of activities)?	Mostly applies / Partially good practice	100%	Yes		
7	Do you wholly or mainly meet the requirements of the Scheme continuity planning module (see paragraph 13 in relation to Management of activities)?	Good practice	75%	Partially		
8	Do you wholly or mainly meet the requirements of the Appointment and role of the chair module (see paragraph 14 in relation to Organisational structure)?	Mostly good practice	50%	Partially		
9	Do you wholly or mainly meet the requirements of the Conflicts of interest module (see paragraph 14 in relation to Organisational structure)?	Partially applies / Partially good practice	77%	Yes		
10	Do you wholly or mainly meet the requirements of the Managing advisers and service providers module (see paragraph 14 in relation to Organisational structure)?	Good practice	87%	Yes		
11	Do you wholly or mainly meet the requirements of the Investment governance module (see paragraph 15 in relation to Investment matters)?	Good practice	96%	Yes		
12	Do you wholly or mainly meet the requirements of the Investment monitoring module (see paragraph 15 in relation to Investment matters)?	Good practice	100%	Yes		
13	Do you wholly or mainly meet the requirements of the Stewardship module (see paragraph 15 in relation to Investment matters)?	Partially good practice	100%	Yes		

Question ID	Question	Application of modules that form part of an ESG for Public Service Pension Schemes	RAG score	Answer	Current Score	Previous Score
14	Do you wholly or mainly meet the requirements of the Climate change module (see paragraph 15 in relation to Investment matters)?	Partially applies / Partially good practice	100%	Yes		
15	Do you wholly or mainly meet the requirements of the General principles for member communications module (see paragraph 16 in relation to Communications and disclosure)?	Applies	83%	Yes		
16	Do you have a documented policy / procedure including a timetable to review (at least every three years) to assess whether the elements that make up each of the areas above are functioning properly?			Yes		
17	Do you wholly or mainly meet the requirements of the Identifying, evaluating and recording risks module in order to comply with the requirements for internal controls (see paragraph 24 in relation to Internal controls)?	Applies	100%	Partially		
18	Do you wholly or mainly meet the requirements of the Internal controls module in order to comply with the requirements for internal controls (see paragraph 24 in relation to Internal controls)?	Applies	83%	Yes		
19	Do you wholly or mainly meet the requirements of the Financial transactions module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	94%	Yes		
20	Do you wholly or mainly meet the requirements of the Record-keeping module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Partially applies / Partially good practice	100%	Yes		
21	Do you wholly or mainly meet the requirements of the Data monitoring and improvement module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	83%	Yes		
22	Do you wholly or mainly meet the requirements of the Receiving contributions module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Partially applies	100%	Yes		
23	Do you wholly or mainly meet the requirements of the Monitoring contributions module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	93%	Yes		

Question ID	Question	Application of modules that form part of an ESOG for Public Service Pension Schemes	RAG score	Answer	Current Score	Previous Score
24	Do you wholly or mainly meet the requirements of the Maintenance of IT systems module in order to comply with the requirements for internal controls (see paragraph 25 in relation to Administration and management)?	Applies	94%	Yes		



# Funding and investment

# Funding and investment – at a glance



## Investment

**Fully compliant in 3 out of 4 modules**



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

## Essential actions

- Consider drafting a Fund specific AVC review policy and procedure document

## Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

# Funding and investment - changes



## Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

### Investment

Amber to Green  
Red to Green  
Red to Amber  
Green to Amber  
Amber to Red  
Green to Red



# Funding and investment



## Investment

### Essential Actions

Module	Question	Action
1 Investment governance	13	Consider drafting a Fund specific AVC review policy and procedure document

### Other Actions

Module	Question	Action
1 No Actions		

# Funding and investment



## Modules

### Investment

- Investment governance (4)
- *Investment decision making (7)*
- Investment monitoring (4)
- Stewardship (6)
- Climate change (3,6)
- *Statement of investment principles (6)\**
- *Default arrangements and charge restrictions (7)*

#### Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

(1) Applies

(2) Mostly applies

(3) Partially applies

(4) Good practice

(5) Mostly good practice

(6) Partially good practice

(7) Does not apply

\* Note that for the Statement of investment principles module the Code references good practice for PSPSs. However, due to the overriding legal requirement to have an Investment Strategy Statement (ISS) in place we have not included any questions on this module but have referred to the ISS within the Investment governance module.



# Funding and investment



## Investment

### Investment governance

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- Notes:**
- Good practice for Local Government Pension Schemes. (This module doesn't apply for any unfunded Public Service Pension Schemes).
  - This module forms part of an Effective System of Governance.
  - Within this module (and the other modules within the Funding and investment section) there are references to the statement of investment principles (SIP). For LGPS funds a broadly equivalent document is the Investment Strategy Statement (ISS). We have therefore included questions in relation to the ISS where appropriate. We note that although the questions in this module are good practice only it is a requirement to have an ISS as set out in the LGPS Investment Regulations 2016.

Question ID	Question	Answer	Current Score	Previous Score
1	Can the PC (or equivalent) demonstrate a good working knowledge of investment matters including their powers and duties relating to their Fund (i.e. is this sufficient to evaluate and challenge the advice received from advisers and service providers)?	Yes		
2	Do you have an Investment Strategy Statement (ISS) approved by the PC (or equivalent) in accordance with the LGPS regulations? (Note that although this module is good practice for LGPS it is a requirement of the LGPS Investment Regulations 2016 that Funds must publish an ISS).	Yes		
3	Is the ISS regularly reviewed (at least every 3 years) and is it currently up to date, accurate, relevant and in accordance with the regulations and guidance? (Note this is also a requirement of the LGPS Investment Regulations 2016).	Yes		
4	Do you clearly document the objectives, roles, responsibilities and reporting relationships of all parties involved in making investment decisions, including where investment decisions are delegated?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
5	Do you ensure that those making investment decisions have the necessary skills, knowledge, information and resources?	Yes		
6	Do you obtain advice and other inputs required from a suitably qualified person to properly govern the scheme's investments?	Yes		
7	Is the governance structure relating to the assessment of investment risks reviewed regularly and appropriate for your Fund?	Yes		
8	Does the PC (or equivalent) delegate investment decisions where appropriate for their Fund's circumstances and level of complexity (e.g. to an investment subcommittee or a qualified investment manager)?	Yes		
9	Are there clear strategic objectives set for appointed investment advisers?	Yes		
10	Does your ISS consider potential long-term effects on scheme investments?	Yes		
11	Do you regularly monitor the performance of your investment managers, including the pool and advisers, including carrying out a formal review at least every 3 years?	Yes		
12	Does the PC (or equivalent) consider the performance of investments quarterly, against the benchmark objectives?	Yes		
13	Do you ensure that your Additional Voluntary Contribution (AVC) arrangements meet the requirements of the Code in relation to Defined Contribution elements (see list in paragraph 10 of this module)?	Partially		
14	Do you have a policy for ensuring investment decisions consider the form and structure of liabilities, the range of employers in the Fund, the employer risk / covenant of those employers, and your Fund's access to cash as required?	Yes		

# Funding and investment



## Investment

### Investment monitoring

- Notes:**
- Good practice for Local Government Pension Schemes. (This module doesn't apply for any unfunded Public Service Pension Schemes).
  - This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do those responsible for your investment governance carry it out with the best interests of scheme members and their beneficiaries in mind?	Yes		
2	Do you have a process to review and negotiate contractual arrangements with investment managers and advisers (either themselves or via delegation to your LGPS pool)?	Yes		
3	Do you regularly review the performance of the investment managers, the pool, and advisers (e.g. against the objectives set for them, their delegated responsibilities and any legal obligations)?	Yes		
4	Do you have procedures to monitor investment performance regularly, against benchmarks and stated short and long-term investment objectives?	Yes		
5	When monitoring investment performance, are investment returns before and after fees considered, and does the process consider whether fees and costs are justified?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
6	Do you consider whether and how to report to interested parties on investment matters, such as scheme members and participating employers?	Yes		
7	Do you ensure that monitoring information is prepared at least quarterly?	Yes		
8	Do you ensure that the analysis of monitoring information includes a stress test, scenario test, or other risk assessment information, to assess the impact of changing circumstances on scheme assets and if relevant, funding level?	Yes		
9	Do you monitor the level of investment risk run to deliver the performance and how this compares with the investment manager's risk targets?	Yes		
10	Do you consider and have processes in place to ensure compliance with environmental, social and governance (ESG) matters and shareholder engagement?	Yes		
11	Do you ensure that controls are in place to alert you to potential financial risks relating to your investment managers?	Yes		
12	Do you regularly assess the effectiveness of processes, ensuring proper review and monitoring of investments and making improvements, as appropriate?	Yes		
13	Have you set clear expectations for investment managers (including your LGPS pool) in relation to monitoring of information and investment risk covering the factors set out in this module?	Yes		

# Funding and investment



## Investment

### Stewardship

#### Notes:

- Partially good practice. Our reading of this module is that it is partially good practice for Public Service Pension Schemes. See paragraphs 12 and 13 which are shown in bold in the extract below. Regardless, the LGPS Investment Regulations 2016 do state that the authority's investment strategy must include "the authority's policy on how social, environmental and corporate governance considerations are taken into account in the selection, non-selection, retention and realisation of investments; and the authority's policy on the exercise of the rights (including voting rights) attaching to investments."

- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Does your ISS include your policy on the exercise of the rights (including voting rights) attached to investments and consider your approach to voting and engagement on relevant matters, including on ESG?	Yes		
2	During the investment manager selection do you obtain the investment managers' stewardship policies and are they regularly reviewed?	Yes		
3	Are you (or your pool) a Signatory to the Financial Reporting Council's UK Stewardship Code?	Yes		
4	Do you engage with investee companies and collaborative industry initiatives directly or indirectly, with a view to mitigating risks to long-term investment goals?	Yes		
5	Do you cooperate with other institutional investors on ESG issues?	Yes		

# Funding and investment



## Investment

### Climate change

- Notes:**
- Partially applies / Partially good practice. Our reading of this module is that it partially applies and is partially good practice for Public Service Pension Schemes . Paragraph 7 applies and paragraphs 4, 5, 6, 8 and 9 are good practice (shown in bold and orange below respectively).
  - This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you assess the risks and opportunities associated with climate change as part of your risk management?	Yes	1	0
2	Do you engage with your advisers and asset managers about how they incorporate climate risk and opportunities into their investment advice to you, and understand how climate risk is considered in investment portfolios?	Yes	1	0
3	Do you consider the possible short, medium and long-term effects of climate change on your objectives and operations?	Yes	1	0
4	Do you document processes for identifying and assessing climate-related risks and opportunities and integrate these into your risk management and governance arrangements?	Yes	1	0
5	Do you ensure you oversee, assess, and manage climate-related risks and opportunities relating to the Fund?	Yes	1	0





# Administration

# Administration – at a glance



## Scheme administration

**Fully compliant in 1 out of 1 module**



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

## Information handling

**Fully compliant in 1 out of 4 modules**



2 questions are red and 2 questions are amber out of 42 questions.

## Essential actions

- Extend business plan to a 3 year rolling plan
- Build in some cross-checking/spot checking of administration procedures being carried out to ensure no bad habits can creep in. Include Tolerance Policy
- Ensure PC/PB members are aware of controls relating to financial transactions and consider training
- Consider making a pension fund specific payments authorisation limits document
- Consider including segregation of duties in pension fund specific authorisation limits document
- Update process notes to include reporting to Action Fraud for refused transfers.
- Update process notes to state actions required if the situation occurs where an aged 50 or over member enquires about transferring AVC to a DC scheme.
- Need to document the Fund's approach to correcting data when accurate data is not available

## IT

**Fully compliant in 0 out of 2 modules**



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

## Contributions

**Fully compliant in 2 out of 3 modules**



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

## Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

# Administration - changes



## Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

### Scheme administration

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

### Information handling

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

### IT

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

### Contributions

- Amber to Green
- Red to Green
- Red to Amber
- Green to Amber
- Amber to Red
- Green to Red

# Administration



## Scheme administration

### Essential Actions

Module	Question	Action
1 Planning and maintaining administration	9	Extend business plan to a 3 year rolling plan
2 Planning and maintaining administration	10	Build in some cross-checking/spot checking of administration procedures being carried out to ensure no bad habits can creep in. Include Tolerance Policy

### Other Actions

Module	Question	Action
1 Planning and maintaining administration	1	Ensure that training 'attendance' is checked and followed up where necessary

## Information handling

### Essential Actions

Module	Question	Action
1 Financial transactions	1	Ensure PC/PB members are aware of controls relating to financial transactions and consider training
2 Financial transactions	3	Consider making a pension fund specific payments authorisation limits document
3 Financial transactions	4	Consider including segregation of duties in pension fund specific authorisation limits document
4 Transfers out	3 b	Update process notes to include reporting to Action Fraud for refused transfers.
5 Transfers out	4	Update process notes to state actions required if the situation occurs where an aged 50 or over member enquires about transferring AVC to a DC scheme.
6 Data monitoring and improvement	6	Need to document the Fund's approach to correcting data when accurate data is not available

### Other Actions

Module	Question	Action
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1	Financial transactions	6	Consider asking employers to formally acknowledge they have read and understand Admin Strategy
2	Data monitoring and improvement	2	Consider if Tracing / Mortality contracts are required

## IT

### Essential Actions

	Module	Question	Action
1	Maintenance of IT systems	3	Need to undertake Disaster Recovery exercise with Heywoods - maybe collaborate with other LGPS Funds
2	Maintenance of IT systems	8	Consider checking service providers standards for maintaining IT systems on an annual basis
3	Cyber controls	4	Need to develop Fund specific cyber incident response plan
4	Cyber controls	9	Check service providers internal cyber controls and review annually

### Other Actions

	Module	Question	Action
1	Cyber controls	1	Ensure Cyber security policy is reviewed annually

## Contributions

### Essential Actions

	Module	Question	Action
1	Monitoring contributions	2	Consider adding a short section on written off contributions into Admin Strategy

### Other Actions

	Module	Question	Action
1	No Actions		

# Administration



## Modules

### Scheme administration

- Planning and maintaining administration (1)

### Information handling

- Financial transactions (1)
- Transfers out (2)
- Record-keeping (3,6)
- Data monitoring and improvement (1)

### IT

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

### Contributions

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

#### Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

- (1) Applies
- (2) Mostly applies
- (3) Partially applies
- (4) Good practice
- (5) Mostly good practice
- (6) Partially good practice
- (7) Does not apply



# Administration



## Scheme administration

### Planning and maintaining administration

#### Notes:

- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Is induction training on administration provided to all PB and PC (or equivalent) members within 6 months of appointment?	Yes		
2	Is update / refresher training on administration (including hot topics) provided to all PB and PC (or equivalent) members?	Yes		
3	Have you documented the administration responsibilities and tasks, including who carries out each of these within the teams (including if a third party / shared service)?	Yes		
4	Does PB / PC (or equivalent) training include a high level overview of responsibilities / tasks in relation to administration, including who performs them (i.e. third party administrator / shared service or who in the in-house team)?	Yes		
5	If administration is outsourced to a third-party have the following aspects been considered as part of the tender process:			
5 a	▪ Appropriate advice and assistance to negotiate contractual terms?	N/A		
5 b	▪ Consideration of quality and value for members when selecting the administrator?	N/A		
6	Is administration considered at all (or most) meetings of the PB and PC (or equivalent)?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
7	Is administration and record-keeping included in your risk register?	Yes		
8	Do you have a Pensions Administration Strategy in place?	Yes		
9	Does your Business Plan outline the key administration tasks / areas of focus for the next 3 years?	Yes		
10	Are administration processes monitored regularly to ensure they are being carried out correctly and improvements made, where required (i.e. periodic checks take place to ensure proper checking and peer review of administration tasks across all processes to ensure compliance with legislation and Fund requirements)?	Yes		
11	Does the administration service (whether in-house or outsourced) provide regular reports (i.e. KPI reports, caseload reports, progress against business plan etc) to senior officers (e.g. at least monthly) which enables them to monitor the team / administrator's performance and challenge the information received?	Yes		
12	If administration is outsourced to a third-party is their performance regularly monitored against contractual (including overriding legal) requirements, and are issues with performance used to drive improvements?	N/A		
13	Does your Business Plan include the date any third party administration / shared service contract is due to cease, with appropriate lead in time to review the approach?	N/A		
14	Are all administration processes documented in a way that would enable continuous and consistent service during an absence or change in personnel or administration provider?	Yes		
15	Is there a robust business continuity plan in place for the administration service (either in-house or outsourced) which is reviewed annually and regularly tested?	Yes		



Question ID	Question	Answer	Current Score	Previous Score
16	Are there clearly documented administration procedures which are regularly reviewed and updated when required due to changes in the scheme rules / internal processes?	Yes		

# Administration

## Information handling

### Financial transactions



- Notes:**
- Applies
  - This module forms part of an Effective System of Governance.
  - This module applies to all financial transactions, including benefits, contributions and investments and you should therefore ensure all financial transactions are considered in answering these questions.

Question ID	Question	Answer	Current Score	Previous Score
1	Are PB and PC (or equivalent) members aware of the general procedures and controls used to ensure financial transactions are processed promptly and accurately?	Partially		
2	Financial transactions reviews:			
2 a	▪ Do you review all processes and systems relating to financial transactions annually?	Yes		
2 b	▪ Does that review lead to improvements in the processes relating to financial transactions, if required?	Yes		
3	Is there a clear and effective authorisation process in place for financial transactions?	Yes		
4	Are processes relating to financial transactions segregated and managed at appropriate levels to ensure suitable authorisation of transactions?	Yes		
5	Are all payments to and from the Fund made electronically with cheques only used in exceptional cases?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
6	Are there clear service standards and Service Level Agreements (SLAs) in relation to financial transactions in place with employers and other stakeholders, and in relation to internal Fund transactions?	Yes		
7	Do you undertake regular reviews of performance against service level agreements for financial transactions and assess if it is satisfactory?	Yes		
8	Do you have clear processes in place around communications with employers to ensure information relating to financial transactions flows appropriately?	Yes		
9	Do you undertake regular reviews of scheme data to ensure it is accurate and complete so that financial transactions can be processed accurately?	Yes		

# Administration

## Information handling

### Transfers out



**Notes:**

- **Mostly applies.** We note that paragraph 9 of this module does not apply to Public Service Pension Schemes.
- **When considering this module, you should also refer to the Pension Regulator's guidance on Dealing with transfer requests (on TPR website see Scheme management detailed guidance / Administration / Dealing with transfer requests). You should also have regard to industry good practice set out in the Pension Scams Industry Group (PSIG) Code of Good Practice.**

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have clear procedures to deal with transfer out requests in a timely manner?	Yes	100%	0%
2	Do you:		100%	0%
2 a	▪ monitor whether you provide CETVs within the legal timeframe?	Yes	100%	0%
2 b	▪ provide CETVs within the legal timeframe?	Yes	100%	0%
2 c	▪ complete transfer out payments within the legal timeframe?	Yes	100%	0%
3	Do you undertake the necessary checks before transferring member benefits to another arrangement, including:		100%	0%
3 a	▪ check the receiving scheme is willing and able to accept the transfer and the receiving scheme is a scheme to which a transfer can legally be made?	Yes	100%	0%

Question ID	Question	Answer	Current Score	Previous Score
3 b	▪ check one of the conditions to transfer is met to grant a statutory right to transfer and if neither condition is met and the receiving scheme may be an illegitimate arrangement refuse the transfer and inform the member and report it to Action Fraud?	Yes	Green	Grey
4	When a member aged over 50 with an AVC arrangement contacts you enquiring about transferring their AVC arrangement out to another Defined Contribution scheme in order to access flexible benefits do you refer them to Pension Wise?	No	Red	Grey
5	Do you undertake the necessary checks as outlined in the Code (as per paragraphs 10 to 12 of this module) before transferring member benefits above £30,000 to a Defined Contribution arrangement, including that independent advice has been sought from a provider you have verified and you have received written confirmation of the advice?	Yes	Green	Grey
6	Are all records relating to the transfer (this includes all documentation as well as file notes from phone calls / workflow tasks etc) retained for as long as is relevant and in line with data protection principles?	Yes	Green	Grey

# Administration

## Information handling

### Record keeping



- Notes:**
- Partially applies / Partially good practice. Paragraphs 7, 9 and 11 of this module are shown as good practice. Therefore we have shown the questions relating to these paragraphs as being good practice only.
  - This module forms part of an Effective System of Governance.
  - The internal control requirements under section 249B of the Pensions Act 2004 are highlighted in the Code in relation to this module. If any elements are highlighted as good practice only, you should still ensure that you have the appropriate internal controls in place.
  - This module applies to record keeping across various areas including member records, transactions and meetings and you should therefore ensure all record keeping is considered in answering these questions. You should also consider the Public Service Pensions (Record Keeping and Miscellaneous Amendment Regulations 2014).

Question ID	Question	Answer	Current Score	Previous Score
1	Overall do you (and any third party administrator / shared service) record the information required as listed in the Record Keeping Regulations for:			
1 a	▪ Members and beneficiaries' data?	Yes – Evidence provided		
1 b	▪ Transactions?	Yes – Evidence provided		

Question ID	Question	Answer	Current Score	Previous Score
1 c	▪ Pension Board meetings and decisions?	Yes – Evidence provided		
2	Do you (and any third-party administrator / shared service) have processes in place to maintain accurate and up-to-date records covering:			
2 a	▪ Members and beneficiaries' data?	Yes		
2 b	▪ Transactions?	Yes		
2 c	▪ Pension board meetings and decisions?	Yes		
3	Do you (and any third-party administrator / shared service) retain records for as long as the information is relevant and in line with data protection legislation?	Yes		
4	Do you (and any third-party administrator / shared service) store data securely and for legitimate purposes only on administration systems?	Yes		
5	Are all member and benefit records held electronically on a dedicated administration system?	Yes		
6	Are records kept of changes to Fund governing documents (e.g. strategies and policies), including records of how the changes have been applied to your members?	Yes		
7	Do you (and any third-party administrator / shared service):			
7 a	▪ Hold all basic member data defined as common data?	Yes		
7 b	▪ Identify, record and validate data defined as scheme specific data?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
8	Do you continually consider technological developments to improve administration and record keeping?	Yes		
9	Do you have processes in place to record member benefits, identifiers, contributions, investments and disinvestments, member decisions, payments, transfers and accurately carry out benefit calculations?	Yes		
10	Do you issue Annual Benefit Statements as required by law, which are accurate, include both accrued and projected benefit amounts and issued in the timescales required? (For LGPS this is by 31 August each year and must be sent to active, deferred, deferred pensioner and pension credit members).	Yes		
11	Do you carry out reconciliations of data, transactions and investments?	Yes		
12	Are there reporting mechanisms in place to identify members approaching retirement and other scheme specific events?	Yes		
13	Do you use software to allow financial and other transactions to be carried out automatically and securely (e.g. monthly scheme member data uploads from employers)?	Yes		
14	Do you regularly generate reports relating to, contributions, membership movements, core data and scheme specific data?	Yes		
15	Do you have processes in place to enable employers to provide timely and accurate data?	Yes		
16	Do you have processes and policies in place to reconcile scheme data with employer data?	Yes		



Question ID	Question	Answer	Current Score	Previous Score
17	Do you have processes in place to identify where an employer fails to meet their legal duties relating to the scheme, and an escalation process in place to manage that situation?	Yes	1	0
18	Do employers understand the main events that must be reported and do you provide ongoing employer information such as employer guides and training to assist employers understand their responsibilities in communicating member information to the scheme?	Yes	1	0

# Administration

## Information handling

### Data monitoring and improvement



**Notes:**

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you (and any third party administrator / shared service) have processes in place to monitor scheme data in line with the requirements of the Code (paragraphs 5a to 5h in this module)?	Yes	Green	Grey
2	Do you assess the need for a data review exercise at least annually (including in relation to any third party administrator / shared service), and identify where any additional data review is needed due to scheme or administrator changes?	Yes	Green	Grey
3	Do you (and any third party administrator / shared service) assess the accuracy and completeness of common data and scheme specific data?	Yes	Green	Grey
4	Do you keep a record of data reviews undertaken and their findings (including by any third party administrator / shared service)?	Yes	Green	Grey
5	Is a data improvement plan in place which is being monitored, actions progressed, and with defined target dates?	Partially	Yellow	Grey
6	Have you clearly documented decisions / policies related to areas where data cannot be corrected?	No	Red	Grey

Question ID	Question	Answer	Current Score	Previous Score
7	Do your member data processes meet the requirements of the Data Protection Act 1998 and the data protection principles?	Yes		
8	Do you have processes in place to address any breaches of the data protection legislation?	Yes		
9	Are all administering authority staff trained in understanding the requirements of data protection law?	Yes		

# Administration



## IT

### Maintenance of IT systems

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**Notes:**

- Applies
- This module forms part of an Effective System of Governance.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you record evidence of how changes are planned and executed within your IT systems?	Yes		
2	Is scheme and member data backed up regularly?	Yes		
3	Are disaster recovery plans in place for IT system failures and are these regularly tested?	Yes		
4	Do you have a written policy / policies for maintaining, upgrading and replacing hardware and software?	Yes		
5	Are you satisfied that adequate IT and personnel resources are available with appropriate functionality / skills?	Yes		
6	Are you able to demonstrate that your IT systems can meet current and anticipated system requirements, including having a schedule for the software to be replaced or updated when legislation changes occur (e.g. for regular changes to tax thresholds / revaluation etc)?	Yes		

Question ID	Question	Answer	Current Score	Previous Score
7	Are you able to demonstrate that you have plans in place to manage expected and potential future upgrades within the administration system?	Yes	Green	Grey
8	Do you ensure that your service providers (note - not just IT service providers) meet TPR's standards for maintaining their own IT systems as set out in paragraph 5 of this module?	Partially	Yellow	Grey

# Administration



## IT

### Cyber controls

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- Notes:**
- **Mostly applies / Partially good practice.** Our interpretation is that most of this module applies to **Public Service Pension Schemes**. Paragraphs 3 and 4 of this module refer to internal controls which is a legal requirement for **Public Service Pension Schemes**. Therefore all questions within this module are shown as applying.
  - **The internal control requirements under section 249B of the Pensions Act 2004 are highlighted in the Code in relation to this module.** If any elements are highlighted as good practice only, you should still ensure that you have the appropriate internal controls in place.
  - **When considering this module, you should also refer to the Pension Regulator’s guidance on Cyber security principles for pension schemes (on TPR website see Scheme management detailed guidance / Administration / Cyber security principles).** We recommend that further action is taken to review this guidance to ensure that you are following it.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a Fund specific Cyber Policy / strategy covering the recommended areas set out in the Code? (paragraphs 8 and 9 of this module)?	Yes	1	0
2	Can the PB and PC (or equivalent) demonstrate good knowledge and understanding of cyber risk and how this relates to the Fund?	Yes	1	0
3	Do you understand the need for confidentiality, integrity and availability of the systems and services for processing personal data?	Yes	1	0

Question ID	Question	Answer	Current Score	Previous Score
4	Do you have a Fund specific Cyber Incident Response Plan which contains: a) clearly defined roles and responsibilities to identify cyber risk and breaches; and b) how to respond to cyber incidents?	Partially		
5	Do you include cyber risks on the Fund's risk register and is this regularly reviewed and discussed at PC (or equivalent) meetings?	Yes		
6	Do you have access to specialist skills and expertise to assist you with understanding and managing cyber risk?	Yes		
7	Do you (or any third party administrator / shared service) have appropriate system controls in place which are up to date (e.g. firewalls, anti-virus and anti-malware products)?	Yes		
8	Have you documented details such as use of devices and working remotely (i.e. Cyber Hygiene guidelines)?	Yes		
9	Do you receive appropriate assurance of service providers' internal cyber controls?	Partially		

# Administration

## Contributions

### Receiving contributions

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- Notes:**
- Partially applies. Our reading of this module is that it partially applies for Public Service Pension Schemes. Paragraphs 1, 2 and 4 apply whilst paragraphs 5 and 6 do not apply (as Public Service Pension Schemes are exempt as set out in paragraph 4).
  - This module forms part of an Effective System of Governance.
  - Refer to Local Government Pension Scheme Regulations 2013, particularly regulations 67, 68 and 71 for requirements relating to payments of contributions.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have in place a Rates and Adjustments Certificate, and do you notify all employers in writing of (a) their required contribution rates in accordance with that Certificate and (b) scheme member contribution rates as updated annually in accordance with the scheme regulations?	Yes		
2	Do you have systems in place to monitor the payment of contributions from employers, and quickly identify and pursue any missing payments, and do you maintain records of missed contributions and all recovery activities?	Yes		



# Administration

## Contributions

### Monitoring contributions



- Notes:**
- Applies
  - This module forms part of an Effective System of Governance.
  - Refer to Local Government Pension Scheme Regulations 2013, particularly regulations 67, 68 and 71 for requirements relating to payments of contributions.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a contributions' monitoring record to determine whether the correct rate of employer contributions are paid, paid on time and in full, and does it include the information required by paragraph 7 in this module?	Yes	Green	Grey
2	Do you keep records of any employer contributions due to the Fund that have been written off, including copies of decisions / authorisation in relation to these?	Partially	Yellow	Grey
3	If administration is outsourced to a third-party who carries out monitoring of contributions for you, do you receive regular information on the payment of contributions to the Fund including when employers have failed to meet deadlines, are paying incorrect amounts or are not providing the required information?	N/A	Green	Grey
4	Do you record and retain information on transactions that supports your monitoring responsibilities, including records of all contributions received in relation to each scheme member and payments of pensions and other benefits?	Yes	Green	Grey
5	Do you carry out regular (at least annual) spot checks on the amount of scheme member contributions being deducted by employers?	Yes	Green	Grey

Question ID	Question	Answer	Current Score	Previous Score
6	Do you have internal controls in place to reconcile all contribution payments notified by an employer against the amounts actually received, and all scheme member contributions notified by an employer against the amounts uploaded to individual scheme member records?	Yes		
7	Do you have processes in place to check on an ongoing basis that employers are providing sufficient information to allow you to monitor both scheme member and employer contributions and that the information provided is in accordance with the LGPS regulation 69(3) and the Code (paragraphs 11a, b and c in this module)?	Yes		

# Administration

## Contributions

### Resolving overdue contributions



- Notes:**
- Applies
  - Refer to Local Government Pension Scheme Regulations 2013, particularly regulations 67, 68 and 71 for requirements relating to payments of contributions.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a documented process and systems in place for dealing with overdue payments and rectifying administration errors, and do they cover the steps outlined in the Code (paragraphs 4a to 4i of this module)?	Yes	1	0
2	Where a payment failure has occurred, do you maintain a record of your investigation, all decisions made and by whom, and communications with the relevant employer?	Yes	1	0
3	Do you periodically undertake a review of processes to detect situations of deliberate underpayment or fraudulent behaviour of an employer?	Yes	1	0
4	Does your process include steps to identify whether a payment failure is of material significance in order to determine whether it should be reported to TPR?	Yes	1	0



# Communications and disclosure

# Communications and disclosure – at a glance



## Information to members

**Fully compliant in 4 out of 5 modules**



No questions are red and 3 questions are amber out of 22 questions.

## Public information

**Fully compliant in 1 out of 2 modules**



1 question is red and no questions are amber out of 14 questions.

## Essential actions

- Consider other member comms (aside from ABSs) via the plain English campaign and check what Comms Policy says
- Review Comms policy to check includes EDI and accessibility
- Consider introducing member surveys to gain feedback
- LPB roles to be added to the WCC Democracy pages

## Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

# Communications and disclosure - changes



## Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

### Information to members

Amber to Green  
Red to Green  
Red to Amber  
Green to Amber  
Amber to Red  
Green to Red

### Public information

Amber to Green  
Red to Green  
Red to Amber  
Green to Amber  
Amber to Red  
Green to Red

# Communication and disclosure



## Information to members

### Essential Actions

Module	Question	Action
1 General principles for member communications	2	Consider other member comms (aside from ABSs) via the plain English campaign and check what Comms Policy says
2 General principles for member communications	3	Review Comms policy to check includes EDI and accessibility
3 General principles for member communications	4	Consider introducing member surveys to gain feedback

### Other Actions

Module	Question	Action
1 No Actions		

## Public information

### Essential Actions

Module	Question	Action
1 Publishing scheme information (PSPS)	2	LPB roles to be added to the WCC Democracy pages

### Other Actions

Module	Question	Action
1 No Actions		

# Communication and disclosure



## Modules

### Information to members

- General principles for member communications (1)
- *Annual pension benefit statements (DC) (7)*
- *Summary funding and pension benefit statements (DB) (7)*
- Benefit information statements (PSPS) (1)
- Retirement risk warnings and guidance (1)
- Notification of right to cash transfer sum or contribution refund (2)
- *Chair's statement (7)*
- Scams (1)
- *Audit requirements (7)*

### Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

- (1) Applies
- (2) Mostly applies
- (3) Partially applies
- (4) Good practice
- (5) Mostly good practice
- (6) Partially good practice
- (7) Does not apply

### Public information

- Publishing scheme information (PSPS) (2,6)
- Dispute resolution procedures (2,6)





# Communications and disclosure



## Information to members

### General principles for member communications

- Notes:**
- Applies
  - This module forms part of an Effective System of Governance.
  - When considering this module, you should also refer to the Pension Regulator's guidance on Equality, Diversity and Inclusion (on TPR website see Scheme management detailed guidance / Governing body / Equality, diversity and inclusion (EDI)).

Question ID	Question	Answer	Current Score	Previous Score
1	Do you:			
1 a	▪ understand the legal requirements around the information you must provide to members and the required timescales as outlined in The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and other legislation?	Yes		
1 b	▪ monitor whether you meet the legal timescales as outlined in The Occupational and Personal Pension Schemes (Disclosure of Information) Regulations 2013 and other legislation?	Yes		
1 c	▪ meet these legal requirements in relation to the information being provided within the required timescales?	Yes		
2	Do you follow the principles of plain English in your communications and ensure that all communications sent to members are accurate, clear, concise and relevant?	Partially		

Question ID	Question	Answer	Current Score	Previous Score
3	Do you consider member engagement, equality, diversity and inclusion when developing member communications to ensure they are accessible for all, including use of accessible on-line content, audio, alternative languages etc?	Partially		
4	Do you regularly review member communications for accuracy and good practice, taking account of member feedback?	Partially		
5	Do you consider and where appropriate, maximise the use of technology in assisting with communication to members, for example the use of a member self-service portal for the membership?	Yes		
6	Do you regularly provide additional information and explanation to members to help them make informed decisions?	Yes		
7	Do you regularly communicate the benefits of the scheme to the membership?	Yes		
8	Do you have a Communications Policy which has been approved by your PC (or equivalent)?	Yes		
9	If yes, do you review your Communications Policy regularly (at least every three years), and is it currently up to date, accurate, relevant and in accordance with LGPS Regulations?	Yes		

# Communications and disclosure



## Information to members

### Benefit information statements (PSPS)

**Notes:**  
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Do you issue all Annual Benefit Statements (covering active members, deferred members, deferred pensioner members and pension credit members) within the required legal timescales (by 31st August)?	Yes		
2	Does the statement for active members include a description of the benefits earned by the member during their pensionable service?	Yes		
3	Do the statements comply with HM Treasury directions and LGPS regulations in terms of what information is included and the way it must be provided to members?	Yes		
4	Are annual benefit statements provided to all members with AVCs within the required timescales?	Yes		
5	Do the annual benefit statements provided to members with AVCs meet the legal requirements in relation to the information provided?	Yes		

# Communications and disclosure



## Information to members

### Retirement risk warnings and guidance

---

**Notes:**

- Applies. This module applies in relation to Additional Voluntary Contribution (AVC) arrangements.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you provide information about Pension Wise with application forms or any other methods that allow members to take payment of their AVC plan, where this is required by legislation?	Yes	1	0
2	Do you check that members have completed and signed a declaration form confirming they have taken guidance or opted out of guidance before processing a member's AVC choices upon drawing benefits, where this is required by legislation?	Yes	1	0

# Communications and disclosure



## Information to members

### Notification of right to cash transfer sum or contribution refund

---

- Notes:**
- Mostly applies. We note that paragraph 8 in this module does not apply to Public Service Pension Schemes.
  - When considering the information in this module, you should also be mindful of other legal timescales including 27A(1)(a) of The Occupational Pension Schemes (Preservation of Benefit) Regulations 1991 requiring notification of rights and options available on leaving within 2 months of being notified pensionable service has terminated.

Question ID	Question	Answer	Current Score	Previous Score
1	Where a member has a right to a cash transfer sum (i.e. cash equivalent transfer value) or a contribution refund do you provide written notice to the member containing the information required to explain their rights, within three months of the date the member leaves the scheme, and advise members where it is likely to take more than three months to provide the information?	Yes		
2	When writing to members about a cash transfer sum or a contribution refund do you give them at least three months to reply and are their wishes carried out within three months of receiving them?	Yes		

# Communications and disclosure



## Information to members

### Scams

**Notes:**  
- Applies  
- When considering this module, you should also refer to the Pension Regulator's guidance on Dealing with transfer requests (on TPR website see Scheme management detailed guidance / Administration / Dealing with transfer requests). You should also have regard to industry good practice set out in the Pension Scams Industry Group (PSIG) Code of Good Practice.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you (or any third party administrator / shared service) have the appropriate internal controls in place to ensure that appropriate steps are taken to mitigate the risk of a scam?	Yes	1	0
2	Are you aware of the warning signs of a scam and do you consider whether these are present when dealing with member requests to transfer out or take benefits?	Yes	1	0
3	Do you ensure that members are provided with relevant information and communications to make them aware of the risks of pension scams?	Yes	1	0
4	Are appropriate due diligence checks carried out when members request a transfer out of the scheme to a Defined Contribution arrangement, where appropriate, and is a check made that at least one of the conditions for a transfer to proceed has been met (i.e. not applicable for a club transfer)?	Yes	1	0

# Communications and disclosure



## Public information

### Publishing scheme information (PSPS)

**Notes:**  
- **Mostly applies / Partially good practice.** Whilst most of this module applies for Public Service Pension Schemes we note that it includes a paragraph (paragraph 6) which sets out a number of items which scheme managers 'may' wish to publish. Therefore we have shown the question relating to this paragraph as being good practice only.

Question ID	Question	Answer	Current Score	Previous Score
1	Do you publish and maintain the required information about the PB (i.e. who the PB members are, scheme member representation and the matters the PB is responsible for)?	Yes	Green	Grey
2	Do you publish other useful related information about the PB as set out in paragraph 6 of this module?	No	Red	Grey
3	Do you have policies and processes to monitor all published data relating to the PB on an ongoing basis to ensure it is accurate and complete?	Yes	Green	Grey
4	Do you ensure any out of date or incorrect information identified is updated as soon as possible and in any event within one month?	Yes	Green	Grey

# Communications and disclosure



## Public information

### Dispute resolution procedures

- Notes:**
- **Mostly applies / Partially good practice.** Whilst most of this module applies for Public Service Pension Schemes we note that it includes a paragraph (paragraph 12) which refers to good practice. Therefore we have shown the questions relating to this paragraph as being good practice only.
  - **This module forms part of an Effective System of Governance.**
  - **The TPR Code clearly states that for Public Service Pension Schemes where the regulations provide for shorter periods to consider grievances than that specified in the Code, those regulations will apply. Therefore, when considering the information in this module, you should also be aware of the scheme specific requirements including regulations 72 to 79 of the Local Government Pension Scheme Regulations 2013.**

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a formal internal dispute resolution procedure including a documented and clear application process for members and prospective members to follow?	Yes	1	0
2	Do you provide your internal dispute resolution procedure to:		1	0
2 a	▪ Prospective members where practical?	Yes	1	0
2 b	▪ Any scheme members who may not have been given the information?	Yes	1	0
2 c	▪ On request from members, if not already provided in the previous 12 months?	Yes	1	0



Question ID	Question	Answer	Current Score	Previous Score
3	Do you provide members with information about the Money and Pensions Service and the Pensions Ombudsman at certain stages of the dispute?	Yes		
4	Do you regularly review and assess compliance with legislation and the effectiveness of your dispute procedure, including ensuring all appropriate information is available and whether separate advice is required to reach a decision?	Yes		
5	Do you have an appointed person (the adjudicator) for dealing with stage 1 disputes and is this person's contact details provided when providing members with the dispute procedure and notifying members of a first instance decision?	Yes		
6	Is the following information made available to members / prospective members as part of any notification of their rights or liabilities under the scheme:			
6 a	▪ The process to apply for a dispute to be resolved, including to who?	Yes		
6 b	▪ The information that an applicant must include?	Yes		
6 c	▪ The process by which decisions are reached?	Yes		
7	Do you ensure that timescales relating to the different stages of the dispute procedure meet the requirements of the LGPS regulations and the Code?	Yes		
8	Does your published procedure include the time limits within which members or prospective members must make an application?	Yes		
9	Do you make your procedure accessible to members and potential applicants by publishing it on a scheme website?	Yes		
10	Do you keep applicants informed of the progress of their dispute, in particular if it is looking likely the timeframes may not be met?	Yes		



# Reporting to TPR

# Reporting to TPR – at a glance



## Regular reports

**Fully compliant in 1 out of 1 module**



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

## Whistleblowing- Reporting breaches of the law

**Fully compliant in 3 out of 4 modules**



No questions are red and 1 question is amber out of 11 questions.

## Essential actions

- Check that advisors are aware or/issued the Breaches Policy
- Consider specific breaches training for those who have responsibility to report breaches
- Consider training on reporting breaches for external stakeholders and maybe refresher training for employers

## Comments

The Administering Authority have selected to answer all questions within this section.

The Administering Authority have selected to include all questions when determining whether they comply with the Code within this section.

# Reporting to TPR - changes



## Changes since previous report (if relevant)

The charts below shows how many responses to the questions have changed Red, Amber, Green (RAG) status within each sub-section. If you click within the blue boxes it will take you to the relevant modules (which also records the previous answer and previous score).

### Regular reports

Amber to Green  
Red to Green  
Red to Amber  
Green to Amber  
Amber to Red  
Green to Red

### Whistleblowing – reporting breaches of the law

Amber to Green  
Red to Green  
Red to Amber  
Green to Amber  
Amber to Red  
Green to Red

# Reporting to TPR



## Regular reports

### Essential Actions

Module	Question	Action
1 No Actions		

### Other Actions

Module	Question	Action
1 No Actions		

## Whistleblowing - reporting breaches of the law

### Essential Actions

Module	Question	Action
1 Who must report	3	Check that advisors are aware or/issued the Breaches Policy
2 Who must report	4	Consider specific breaches training for those who have responsibility to report breaches
3 Reporting payment failures	1	Consider training on reporting breaches for external stakeholders and maybe refresher training for employers

### Other Actions

Module	Question	Action
1 No Actions		

# Reporting to TPR



## Modules

### Regular reports

- Registrable information and scheme returns (1)

### Whistleblowing - reporting breaches of the law

- Who must report (1)
- Decision to report (1)
- How to report (1)
- Reporting payment failures (1)

#### Notes:

The numbers next to the module names above set out Aon's interpretation of the Code for Public Service Pension Schemes. Please note it should not be taken as legal advice.

- (1) Applies
- (2) Mostly applies
- (3) Partially applies
- (4) Good practice
- (5) Mostly good practice
- (6) Partially good practice
- (7) Does not apply



# Reporting to TPR



## Regular reports

## Registrable information and scheme returns

---

**Notes:**  
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Is your Fund / scheme registered with TPR?	Yes	1	0
2	Are you aware of the requirement to report any changes to registrable information to TPR as soon as is reasonably practicable, and at the very latest, within five working days of you becoming aware of the change? (Note this includes changes to contact details and employers).	Yes	1	0
3	Do you ensure that your scheme return is completed accurately and submitted annually in the required timescale?	Yes	1	0

# Reporting to TPR



## Whistleblowing – reporting breaches of the law

### Who must report

**Notes:**  
- Applies  
- When considering this module, you should also refer to the Pension Regulator’s guidance on **Complying with the duty to report breaches of law** (on TPR website see **Scheme management detailed guidance / Communications and reporting / Complying with the duty to report breaches of law**).

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have arrangements in place, such as a documented Breaches of the Law Procedure (or equivalent) and separate processes, to ensure breaches of the law are identified, recorded and managed?	Yes	Green	Grey
2	Is this Procedure (or equivalent) regularly reviewed (at least every three years), and is it currently up to date, accurate, relevant and in accordance with legal and Code requirements?	Yes	Green	Grey
3	Have you provided your Breaches of the Law Procedure (or equivalent) to those responsible for reporting breaches to ensure they are aware of their legal responsibilities and requirements of the Code to report breaches to TPR (i.e. Fund Officers, PCs (or equivalent), PBs, Service Providers, Employers, Professional Advisers)?	Yes	Green	Grey
4	Do you provide additional training on reporting breaches to those responsible for reporting breaches and does this highlight (a) that breaches of the law go beyond administrative tasks and record keeping and (b) the whistleblowing protection?	Partially	Yellow	Grey



# Reporting to TPR



## Whistleblowing – reporting breaches of the law

### Decision to report

---

- Notes:**
- Applies
  - When considering this module, you should also refer to the Pension Regulator’s guidance on Complying with the duty to report breaches of law (on TPR website see Scheme management detailed guidance / Communications and reporting / Complying with the duty to report breaches of law).

Question ID	Question	Answer	Current Score	Previous Score
1	Does your Breaches of the Law Procedure (or equivalent) include information to ensure that TPR’s expectations for identifying and assessing breaches are met?	Yes		
2	Does your Breaches of the Law Procedure (or equivalent) include a process to determine whether a breach or potential breach of the law is of “material significance” taking into account the cause, effect and reaction to the breach, including where TPR guidance can be found?	Yes		

# Reporting to TPR



## Whistleblowing – reporting breaches of the law

### How to report

- Notes:**
- Applies
  - When considering this module, you should also refer to the Pension Regulator’s guidance on Complying with the duty to report breaches of law (on TPR website see Scheme management detailed guidance / Communications and reporting / Complying with the duty to report breaches of law).

Question ID	Question	Answer	Current Score	Previous Score
1	Does your Breaches of the Law Procedure (or equivalent) include all the elements within paragraph 2a to 2f of this module?	Yes		
2	Do you make information available to those responsible for reporting breaches for your Fund setting out how to make a report to TPR, what should be included in the report and the timescales within which the report should be made?	Yes		
3	Do you have a system in place for recording breaches, even if they are not reported to TPR (e.g. in a Breaches Log) including ongoing assessment of those breaches?	Yes		

# Reporting to TPR



## Whistleblowing – reporting breaches of the law

### Reporting payment failures

---

**Notes:**  
- Applies

Question ID	Question	Answer	Current Score	Previous Score
1	Do you have a process in place to ensure all those who have a duty to report breaches report all contribution payment failures deemed to be of material significance to TPR, and within the timeframes specified in the Code?	Yes		
2	Do you have a system in place for recording all contribution payment failures, even if they are not reported to TPR (e.g. in a Breaches Log)?	Yes		

## Evidence

On this page you can input links (e.g. to webpages, internal file paths etc) to assist with your documentation of compliance against the Code. You can use this to supplement the information you input in the 'Comment / Evidence (please provide evidence of compliance or comment on areas of non-compliance)' column within each module. The inputs to that column are limited to text so if you wish to include links to various policies, processes and procedures you can do that on this page and then reference this page within the 'Comment / Evidence' column, e.g. 'This is included in the Governance policy - see item 1 on the Evidence sheet'.

Please note that you are unable to embed any documents into this model, e.g. Microsoft Word documents. If you wish to reference a document rather than a web page then we suggest you add a link to where this can be found on your systems, or if you are unable to add a link for some reason then we suggest just adding a description to where the document can be found.

When you copy a webpage, internal file path etc into the Link column you will then need to insert a hyperlink. You can do this by going into the cell, right click on your mouse and select Link or go to Insert on your tool bar and then select Link. A box named Insert Hyperlink should pop up and you will need to copy the full web address / file path into the Address bar. In the Text to display bar you can input a suitable name which will then show in the Link column.

Item	Policy / Process / Procedure / Document name	Comment	Link
1	Corporate Governance Policy Statement		<a href="#">WCCC-67491560-1365 (warwickshire.gov.uk)</a>
2	Warwickshire Local Pension Board Terms of Reference		<a href="#">Local Pension Board Draft Terms of Reference.docx.docx (warwickshire.gov)</a>
3	Warwickshire Pension Fund Training Policy		<a href="#">WCCC-67491560-1368 (warwickshire.gov.uk)</a>
4	Minutes of Local Pension Board meetings		<a href="#">Browse meetings - Warwickshire Local Pension Board – Warwickshire Count</a> <a href="https://democracy.warwickshire.gov.uk/ie/ListDocuments.aspx?Cid=263&amp;Mid=310&amp;Ver=4&amp;Info=1&amp;bcr=1">https://democracy.warwickshire.gov.uk/ie/ListDocuments.aspx?Cid=263&amp;Mid=310&amp;Ver=4&amp;Info=1&amp;bcr=1</a>
5	Warwickshire County Council Constitution		
6	Minutes of Staff and Pensions committee		<a href="#">Browse meetings - Staff and Pensions Committee – Warwickshire County Cc</a>
7	Minutes of Investment Sub Committee		<a href="#">Browse meetings - Pension Fund Investment Sub-Committee – Warwickshire</a>
8	May 2024 PFISC Meeting Minutes Election of Chair		<a href="#">Signed Minutes Public - PFISC 14 May 2024.pdf</a>
9	May 2024 SPC Meeting Minutes Election fo SPC Chair and Creation of ISC members		<a href="https://democracy.warwickshire.gov.uk/documents/b13556/Signed%20Minut">https://democracy.warwickshire.gov.uk/documents/b13556/Signed%20Minut</a>
10	Warwickshire Pension Fund Risk Policy		<a href="#">WCCC-1980322935-2556</a> <a href="#">(Public Pack)Agenda Document for Pension Fund Investment Sub-Committee, 10/06/2024 10:00</a>
11	Minutes of June 2024 ISC with Full Risk Register		
12	Funding Strategy Statement		<a href="#">WCCC-67491560-1426</a>
13	Investment Strategy Statement		<a href="#">Microsoft Word - WARwickshire Pension Fund Investment Strategy Statemen</a>
14	2022/23 Annual Report for Auditor evidence		<a href="#">WCCC-67491560-1464</a>
15	Pension Fund Management - Internal Uadit Service report		<a href="http://warwickshiregovuk.sharepoint.com/sites/PensionFundManagers/Shared_Doc">warwickshiregovuk.sharepoint.com/sites/PensionFundManagers/Shared_Doc</a>
16	Critical Services Plan (BCP)	Private doc to be shared on day of review +	
17	WPF Conflicts of Interest Policy		<a href="#">WCCC-67491560-1436</a>
18	WCC Contract Standing Orders (Procurement)		<a href="#">Pre-Procurement</a>
19	Contract Management Framework		<a href="#">WCC Contract Management Framework.docx</a>
20	Conflict of Interest Declaration Template		<a href="#">ConflictofInterestDeclarationTemplate.doc</a>
21	WPF Breaches Policy		<a href="#">WCCC-67491560-1411</a>

Item	Policy / Process / Procedure / Document name	Comment	Link
22	Climate Risk Policy		<a href="https://api.warwickshire.gov.uk/documents/WCCC-67491560-1471">WCCC-67491560-1471</a>
23	Hymans LOLA training report		<a href="https://my.sharepoint.com/:x:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/LGPS_Online_Learning">my.sharepoint.com/:x:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/LGPS_Online_Learning</a>
24	LOLA Current Issues		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Lola%20Current%20Issu">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Lola%20Current%20Issu</a>
25	Pension Administration Strategy		<a href="https://api.warwickshire.gov.uk/documents/WCCC-67491560-1468">https://api.warwickshire.gov.uk/documents/WCCC-67491560-1468</a>
26	Pension Fund Process Notes		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/Shared%20Documents/General/Processes%20and%20Guides?csf=1&amp;web=1&amp;e=8Y9rOZ">eam/Shared%20Documents/General/Processes%20and%20Guides?csf=1&amp;web=1&amp;e=8Y9rOZ</a>
27	Board Training		<a href="#">Training Related Documents</a>
28	Risk Register		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Risk_Register">ndManagers/ layouts/15/Doc.aspx?sourcedoc=%7BEA78F996-CAB8-455A-8830-</a>
29	Business Plan		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Business_Plan">ndManagers/ layouts/15/Doc.aspx?sourcedoc=%7BA28E3D4F-0054-4BED-9555-</a>
30	BCP exercise report		<a href="https://my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Pensions-%20Business">my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Pensions-%20Business</a>
31	Financial systems Audit		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Warwickshire%20Count">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Warwickshire%20Count</a>
32	WCC Financial regulations		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Financial%20Regulation">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Financial%20Regulation</a>
33	Breaches Log		<a href="https://my.sharepoint.com/:x:/r/personal/alistairwickens_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7B33EC9F2F-">my.sharepoint.com/:x:/r/personal/alistairwickens_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7B33EC9F2F-</a>
34	KPI Worksheet		<a href="https://my.sharepoint.com/:x:/r/personal/lisaeglesfield_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7BEC9F1E60-">my.sharepoint.com/:x:/r/personal/lisaeglesfield_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7BEC9F1E60-</a>
35	WPF Communications Policy		<a href="https://api.warwickshire.gov.uk/documents/WCCC-67491560-1340">WCCC-67491560-1340</a>
36	Transfer Checklist		<a href="https://my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/TVCHECKL.doc?d=we">my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/TVCHECKL.doc?d=we</a>
37	Transfer Out KPI		<a href="#">Tv Out report.pdf</a>
38	Transfer out process		<a href="#">Money out</a>
39	CIPFA Benchmarking		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/Shared%20Documents/Statistical%20returns/CIPFA%20benchmarking/2024/Pensions24_Questionnaire%20Ve">ndManagers/Shared%20Documents/Statistical%20returns/CIPFA%20benchmarking/2024/Pensions24_Questionnaire%20Ve</a>
40	Data Retention Policy		<a href="https://api.warwickshire.gov.uk/documents/WCCC-67491560-1403">https://api.warwickshire.gov.uk/documents/WCCC-67491560-1403</a>
41	TPR Screenshot		<a href="https://my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/TPR%20screenshot.do">my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/TPR%20screenshot.do</a>
42	TPR scheme return		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Scheme%202023.pdf?c">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Scheme%202023.pdf?c</a>
43	AVC Options paperwork		<a href="#">AVC</a>
44	Internal Audit report		<a href="https://my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Final%20IA%20Report">my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Final%20IA%20Report</a>
45	Workload Monitoring		<a href="https://my.sharepoint.com/:x:/r/personal/ianmorris_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7BF3E6D9F8-61D6-">my.sharepoint.com/:x:/r/personal/ianmorris_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7BF3E6D9F8-61D6-</a>
46	Workload monitoring 2		<a href="https://my.sharepoint.com/:x:/r/personal/ianmorris_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7BF3E6D9F8-61D6-">my.sharepoint.com/:x:/r/personal/ianmorris_warwickshire_gov_uk/ layouts/15/Doc.aspx?sourcedoc=%7BF3E6D9F8-61D6-</a>
47	Unit 4 User Guides		<a href="https://warwickshiregovuk.sharepoint.com/SitePages/Agresso(1).aspx">https://warwickshiregovuk.sharepoint.com/SitePages/Agresso(1).aspx</a>
48	Club Vita Summary report		<a href="#">WARW VitaSummary Report 2023.pdf</a>

Item	Policy / Process / Procedure / Document name	Comment	Link
49	Club Vita Data report		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/WARW%20VitaCleansin">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/WARW%20VitaCleansin</a>
50	Fund Policy Schedule		<a href="#">Policy schedule - including workflow.xlsx</a>
51	2024 ABS Active run		<a href="https://my.sharepoint.com/:x:/r/personal/kellyharrow_warwickshire_gov_uk/_layouts/15/Doc.aspx?sourcedoc=%7B75657F15-1DB0-">my.sharepoint.com/:x:/r/personal/kellyharrow_warwickshire_gov_uk/_layouts/15/Doc.aspx?sourcedoc=%7B75657F15-1DB0-</a>
52	Advanced data review email		<a href="#">RE Warwickshire - Advanced Data Review.eml</a>
53	Workflow event Screenshot		<a href="https://my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Workflow%20event%2">my.sharepoint.com/:w:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Workflow%20event%2</a>
54	Workflow event report		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Workflow%20event%2">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Workflow%20event%2</a>
55	Movement reports		<a href="https://my.sharepoint.com/personal/kellyharrow_warwickshire_gov_uk/_layouts/15/onedrive.aspx?e=5%3A0755da062d7d4cf99251">my.sharepoint.com/personal/kellyharrow_warwickshire_gov_uk/_layouts/15/onedrive.aspx?e=5%3A0755da062d7d4cf99251</a>
56	Data Breach Reporting WCC		<a href="https://warwickshiregovuk.sharepoint.com/SitePages/Data-breach,-security-incident-reporting.aspx">https://warwickshiregovuk.sharepoint.com/SitePages/Data-breach,-security-incident-reporting.aspx</a>
57	Data Protection WCC		<a href="https://warwickshiregovuk.sharepoint.com/SitePages/Data-protection,-confidentiality-and-privacy.aspx">https://warwickshiregovuk.sharepoint.com/SitePages/Data-protection,-confidentiality-and-privacy.aspx</a>
58	Information Compliance WCC		<a href="https://api.warwickshire.gov.uk/documents/WCCC-1073-234">https://api.warwickshire.gov.uk/documents/WCCC-1073-234</a>
59	Altair system release guide		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Public%20Sector%20-">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Public%20Sector%20-</a>
60	Heywoods Disaster recovery policy		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Heywoods%20-">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/Heywoods%20-</a>
61	Heywoods Cyber security Report		<a href="https://my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/CSR%202024%20Sum">my.sharepoint.com/:b:/r/personal/lisaeglesfield_warwickshire_gov_uk/Documents/TPR%20Evidence/CSR%202024%20Sum</a>
62	Guide to working remotely		<a href="https://warwickshiregovuk.sharepoint.com/SitePages/Guide-to-Remote-Working.aspx">https://warwickshiregovuk.sharepoint.com/SitePages/Guide-to-Remote-Working.aspx</a>
63	Rates and Valuation Certificate		<a href="https://sTeam/_layouts/15/Doc.aspx?sourcedoc=%7BCED88BBB-B0E4-4BFE-A844-407EEB4F720D%7D&amp;file=WPF%20-">sTeam/_layouts/15/Doc.aspx?sourcedoc=%7BCED88BBB-B0E4-4BFE-A844-407EEB4F720D%7D&amp;file=WPF%20-</a>
64	2022 Valuation Report		<a href="#">WCCC-67491560-1378</a>
65	IDRP Policy		<a href="#">WCCC-67491560-1465</a>
66	BCPP RI and Stewardship Report		<a href="#">Border-to-Coast-Responsible-Investment-Stewardship-Report-22_23.pdf</a>
67	BCPP Quarterly Stewardship Report - Q4 2023		<a href="#">Quarterly Stewardship Report</a>
68	WCC Firewall policy		<a href="https://warwickshiregovuk.sharepoint.com/sites/edrm-IS2/Shared Documents/Forms">warwickshiregovuk.sharepoint.com/sites/edrm-IS2/Shared Documents/Forms</a>
69	BCPP Investments OOG Agenda		
70	Responsible Investment Policy		<a href="#">WCCC-67491560-1375</a>
71	Warwickshire County Council data protection		<a href="#">Data protection – Warwickshire County Council</a>
72	WCC Democracy web pages		<a href="#">Democracy – Warwickshire County Council</a>
73	WCC Computer Software Licence Policy (Internal only)		<a href="#">Information Security - InformationSecurity - All Docs</a>
74	WCC Anti Malware Policy		<a href="#">Information Security - InformationSecurity - All Docs</a>
75	WCC firewall Management Policy		<a href="#">Information Security - InformationSecurity - All Docs</a>

Item	Policy / Process / Procedure / Document name	Comment	Link
76	WCC Mobile Device Policy		
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The information set out in this report is based on the expectations set out in the Code, compared to your current practice and it is not a regulatory and compliance audit. The information is based on the responses by the Administering Authority to questions set by Aon based on information contained in the Code.

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