

## Appendix 2 – Scorecard Assessment

The following gives an overview of the current compliance position against the General Code of Practice.

<b>The Governing Body: Board Structure and Activities</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
Members of governing bodies to display the characteristics shown in <b>Appendix 1.</b>	Fully met
<b>The Governing Body: Knowledge &amp; Understanding</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
All governing bodies should maintain a list (in an accessible format) of items the members of the governing body should be familiar with.	Fully met
The governing body should regularly carry out an audit of its members' skills and experience to identify gaps and imbalances.	Partially met
Pension board members should have a working knowledge of the topics in Appendix 4.	Fully met
The pension board meet the requirements in Appendix 5.	Fully met
Members of the pension board should be aware that their responsibilities and duties begin from the date they take up their post.	Fully met
Governing bodies should provide the necessary training and support to it's members.	Fully met
<b>The Governing Body: Risk Management</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
The governing body should identify risks, record them, and regularly review and evaluate them  (see Appendix 11 for guidance on identifying, evaluating and recording risk)	Fully met
The governing body should design internal controls which ensure that the scheme is administered and managed in accordance with the requirements of the law and the scheme rules. The scheme's internal controls should also:  - Include a clear separation of duties for those performing them, and processes for escalation and decision-making - Require the exercise of judgement, where appropriate, in assessing the risk profile of the scheme and in designing appropriate controls.	Fully met
The governing body should make sure that their internal controls are documented.	Partially met
Reviews should also be carried out when:  - Substantial changes to the scheme take place. These include changes to pension scheme personnel, service providers, scheme advisors, or administration and other IT systems; - A control is not working to the standard required by the law.	Fully met
When designing internal controls governing bodies should consider TPR expectations  (see Appendix 12 for more detail)	Fully met
To maintain internal controls governing bodies should consider TPR expectations  (see Appendix 13 for more detail)	Fully met
The governing body may consider using assurance reports to assess whether the scheme or a service provider meets the relevant legislative requirements on internal controls.	Fully met
If selecting a suitable internal auditor, the governing body should consider:  - The candidate's independence - Any actual or potential conflicts of interest (see Conflicts of interest) - The candidate's knowledge of the subject	Fully met
The governing body should read and understand assurance reports provided by service providers to establish if the controls used by the organisations that they outsource various functions to are adequate. This will also include assurance reports produced by the scheme's investment manager and custodian.	Fully met

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They should consider the scope of such reports and the degree to which these are applicable. For example, whether the reports cover the specific team or office providing services to the scheme.	
When identifying and evaluating risks, governing bodies should consider conflicts of interest.	Fully met
Where management of conflicts of interest form part of the scheme manager's internal controls the following expectation apply;  - Members of governing bodies should understand when potential and actual conflicts arise legal and professional requirements and legislation that apply to English local authorities should apply - The requirements in Appendix 15 are met.	Fully met
Governing bodies should have processes in place to ensure that their decision-making is not compromised by actual or potential conflicts	Fully met
Governing bodies should consider seeking independent legal advice, to help decide whether an actual or potential conflict of interest can be eliminated (and if so, the best way of achieving it)	Fully met
<b>The Governing Body: Scheme Governance</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
The scheme manager needs to have a system of governance and internal controls that;  - Provide the governing body with oversight of the day-to-day operations of the scheme - Include any delegated activities for which the governing body remains accountable - Provide the governing body with assurances that their scheme is operating correctly and in accordance with the law	Fully met
<b>Administration: Scheme Administration</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
With regard to planning and preparation governing bodies should comply with the requirements in <b>Appendix 21</b> .	Fully met
To maintain proper administration, governing bodies should comply with the requirements set out in <b>Appendix 22</b> .	Fully met
<b>Administration: Information Handling</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
The management of financial transactions should be proportionate to the nature, complexity, and activity of the scheme. Governing bodies should comply with the requirements of <b>Appendix 24</b> .	Fully met
Governing bodies should ensure that they have the necessary administrative procedures to deal with transfer requests, without undue delay and in line with scheme rules and the law.	Fully met
Governing bodies should also maintain accurate and complete records of all requests received and the transfers that have been made.	Fully met
Where the governing body suspect the receiving scheme is an illegitimate arrangement, they should report it to Action Fraud.	Fully met
Where the governing body believe they will not meet the legislative deadlines, they should make an application to TPR before the deadline.	Not completed
When checking written confirmation governing bodies should follow advised steps around record keeping and responding to suspected fraudulent activity  (See Appendix 25 for full details)	Fully met
Governing bodies should meet the record keeping requirements set out in Appendix 26	Fully met
When maintaining administrative systems governing bodies should comply with the measures laid out in Appendix 28.	Fully met
Governing bodies should ensure that appropriate processes are in place:	Fully met

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- To enable participating employers to provide timely and accurate data	
- To reconcile employer data and scheme data	
- For situations where an employer fails to meet their legal duties to the scheme	
Governing bodies should retain records for as long as they are needed	Fully met
Governing bodies should have appropriate processes in place for monitoring scheme data (see <b>Appendix 29</b> for full details)	Fully met
Governing bodies should have appropriate processes in place for reviewing scheme data (see <b>Appendix 30</b> for full details)	Fully met
Governing bodies should have appropriate processes in place for protecting scheme data (see <b>Appendix 31</b> for full details)	Fully met
<b>Administration: IT &amp; Cyber</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
Governing bodies should take steps to make sure their service providers can prove they meet our expectations for maintaining IT systems as listed in Appendix 32	Fully met
<b>Administration: Contributions</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
Governing bodies should develop a record to monitor contribution payments to the scheme (a contributions monitoring record).	Fully met
Governing bodies should have processes in place to check contributions due to the scheme and to reconcile them with what is actually paid to identify payment failures.	Fully met
Governing bodies should develop and maintain records for monitoring contribution payments to the scheme. This should include: contribution rates, date contributions are due, interest on late payments.  (see <b>Appendix 35</b> for full details)	Fully met
Governing bodies must also keep records of any employer contributions due to the scheme that have been written off.	Fully met
When a payment failure is identified, the governing body should contact the employer quickly to resolve the overdue payment.	Fully met
The governing body should obtain overdue payments and rectify administrative errors.  (see <b>Appendix 36</b> for more detail)	Fully met
Governing bodies should maintain a record of their investigation and the communications between themselves and the employer.	Partially met
The governing body should review current processes to detect situations where fraud may be more likely to occur and where additional checks may be needed.	Fully met
<b>Communications and Disclosure: Information to Members</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
The governing body should follow the principles set out in the section entitled "General Principles for Member Communications".  TPR expectations are listed in <b>Appendix 37</b>	Fully met
Scheme managers should follow the principles set out in the section entitled "General Principles for Member Communications" when drafting benefit information statements. (see <b>Appendix 38</b> for more detail)	Partially met
The term "reasonable period" in the phrase above should be construed as 3 months from leaving. Governing bodies should advise members where it is likely to take more than 3 months to provide the information.	Fully met

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The governing body should give members 3 months to confirm if they wish to transfer their cash transfer sum and can extend this deadline at their discretion. If the member does not respond, the governing body may arrange to pay a contribution refund after a further month.	Fully met
Where a member elects for a cash transfer sum the governing body should pay it within 3 months but can extend in exceptional circumstances.	Fully met
As part of their internal controls, governing bodies should ensure that they take the steps set out in <b>Appendix 39</b> .	Fully met
<b>Communications and Disclosure: Public Information</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
Scheme managers should consider requests for additional information to be published, to encourage scheme member engagement and promote	Fully met
Scheme managers should: <ul style="list-style-type: none"> <li>- Have policies and processes to monitor all published data on an ongoing basis to ensure it is accurate and complete</li> <li>- Ensure any out-of-date or incorrect information identified is updated as soon as possible and in any event, within one month</li> </ul>	Fully met
There are further considerations the governing body should make in relation to the dispute resolution process.  (see <b>Appendix 40</b> for further details).	Fully met
In relation to reasonable time periods governing bodies should: <ul style="list-style-type: none"> <li>- Decide the matter in dispute within four months of receiving the application</li> <li>- In the case of a two-stage dispute resolution procedure, reach a first stage decision within four months of receiving the application</li> <li>- In the case of a two-stage dispute resolution procedure, reach a second stage decision within four months of the point when the governing body receives the referral</li> <li>- Notify applicants of the decision no later than 21 days from when it is made</li> <li>- Not delay a decision where it is possible to process an application sooner than four months</li> <li>- Allow more than four months to reach a decision if it is appropriate to do so</li> </ul> <p>For public sector schemes, where the governing regulations provide for shorter periods to consider grievances than set out above, those regulations will apply</p>	Partially met
When reviewing an application, decision-makers should: <ul style="list-style-type: none"> <li>- Ensure they have all the appropriate information to make an informed decision</li> <li>- Request further information if required</li> <li>- Be satisfied that the time and action to reach a decision and notify the applicant are appropriate to the situation, and be able to demonstrate this</li> </ul>	Fully met
<b>Reporting to TPR: Reporting Breaches</b>	
<b>TPR Expectations</b>	<b>Current rating</b>
Governing bodies should be satisfied that those responsible for reporting breaches are aware of the legal requirements and this code. Training should be provided for the Governing body and any in-house administrators (see <b>Appendix 41</b> for more details)	Fully met
Those responsible for reporting breaches, including the governing body, should establish and operate procedures to ensure they are able to meet their legal duties (see <b>Appendix 42</b> for list of procedures governing bodies could have in place)	Fully met
Breach report should contain the information listed in <b>Appendix 43</b> .	Fully met

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<p>There are other requirements placed on those running pension schemes to report to other bodies. Where the duty to report to another body coincides with the duty to report to TPR, the report to us should include details of the other bodies the matter has been reported to.</p>	Fully met
<p>If a scheme or an individual is at risk, for example where there has been dishonesty, the reporter should not take any actions that may alert those implicated that a report has been made. Similarly, reporters should not delay their report to TPR, to check whether any proposed solutions will be effective.</p>	Fully met
<p>Reports of late contribution payments should be made to us within 14 days of the trustees having reasonable cause to believe that a material payment failure exists. Members should be notified within 30 days of the report to TPR. When reporting to members, governing bodies should provide payment information that will enable them to understand what has been paid to the scheme and by whom.</p>	Fully met