
Appendix 2: TPR Consolidated Code Proposals

Number	Module Title		Comments / Overview
<u>The Governing Body</u>			
TGB006	Meetings and Decision-making	NEW	In most cases meet at least quarterly. Written meeting records to be held with a list of required info to be noted. Establish a process for meetings e.g. set frequency, develop policy on how/when extraordinary meetings should be held, create process for rescheduling meetings, agree responsibilities for agenda setting etc. Retention of documentation surrounding decision making. Consider ways to publish additional information such as information requested by the governing body to encourage member engagement and promote transparency.
TGB016	Remuneration policy	Best Practice	Not needed by Public service schemes but could be adopted as best practice. Remuneration policy sets out levels and means for remunerating those undertaking activities in relation to the scheme paid for by the governing body

			and/or sponsoring employer. Need to establish policy and keep written record. Consider any outsourced service provider including actuarial, legal advisory and investment services.
TGB010	Managing advisers and service providers	NEW	Establish agreed and documented policies for making appointments to the scheme - review at least biannually. Consider tender processes. Consider degree of delegation. Review relevant frameworks for specialist functions if required. Carry out due diligence prior to appointments. Agree accountability and performance indicators, escalation points, process of recording decisions etc. Consider data protection legislation when sharing information. Be aware of obligations, professional conduct rules and whistleblowing requirements that may be placed on some advisers. Regularly assess performance against agreed KPIs and set objectives. Periodically review the market of service providers. Develop a process to ensure that improvements are made where poor service is identified. Plan effectively for replacing or transitioning to new service providers.

TGB033	Assurance of governance and Internal controls	Existing	New material on assurance - statutory external audit undertaken only provides assurance on financial elements but cannot provide assurance on member benefits for example. Adequate internal controls i.e Internal Audit will help with this.
TGB022	Continuity Planning	Best Practice	Best practice to have a BCP in place should there be a disruption to the activities of the scheme. Scheme should seek to ensure continuity and regularity in the performance of the scheme.
<u>Funding on investment</u>			
FAI001	Investment governance	BP	Not required in legislation but LGPS scheme managers should approach investment governance in the same way. Ensure scheme manager and those involved in investment decisions have required skills & knowledge. Appoint suitably qualified advisers. Produce statement of investment principles (FSS? ISS?) Document objectives, role and responsibilities of

			those involved in decision making. Assess investment performance at least quarterly. Ensure there is sufficient expertise to challenge any advice given. Formally consider performance of investment managers/advice providers triennially and act on any issues identified.
FAI005	Investment monitoring	BP	Not required in legislation but LGPS scheme managers should approach investment governance in the same way. Governing bodies should be confident that investment governance is carried out in accordance with legal obligations, with scheme members best interests in mind, and by people with the right expertise. Governing bodies should have procedures in place to monitor scheme investment and performance, and set expectations for investment managers.
<u>Administration</u>			
ADM001	Adminstration	NEW	Scheme managers are required under legislation to establish and operate internal controls which adequate to ensure the scheme is administered and

			<p>managed in accordance with the scheme regulations. Maintain sufficient scheme knowledge, understand administrator responsibilities. Include administration as a regular agenda item on meetings. Develop long term admin strategy. Maintain proper administration, monitor and reviewing reports and challenging where appropriate, have a BCP.</p>
ADM002	Financial Controls	NEW	<p>Scheme managers are required under legislation to establish and operate internal controls which adequate to ensure the scheme is administered and managed in accordance with the scheme regulations. Understand the procedures and controls the administrator operates to ensure that financial transactions are processed promptly and accurately. Annually review all processes and systems related to financial transactions and improve where necessary. Have expected SLAs in place and monitor performance against these. Ensure comms with employers is maintained so that necessary information is shared timely and accurately. Ensure that finance data is processed accurately so</p>

			that core transactions can be processed accurately.
ADM014	Transfers	NEW	Governing bodies should ensure that they have the necessary administrative procedures in place to deal with transfer requests without undue delay.
ADM003	Scheme Records	NEW	Maintain complete and accurate records. Establish and operate internal controls which are adequate for the purpose of securing that the scheme is administered and managed in accordance with scheme rules.
ADM006	Data Monitoring	NEW	Records must be maintained. Scheme managers should establish and operate internal controls securing this. Monitor data regularly, ensuring its complete and accurate. Ensure info is received regarding material errors. Plan for improving data where necessary and monitor this. Reconcile member records with info held by the employer. Reconcile scheme membership regularly. Assess the need for data review at least annually including

			common and scheme data. Ensure processes meet the requirements of data protection legislation. Understand obligations of data protection law.
ADM0015	Maintenance of IT systems	NEW	Maintain appropriate IT systems, which are reviewed and maintained regularly with processes for transmission of information. ICT systems should be able to meet scheme's need and legal requirements. Service providers should be able to demonstrate that they meet expectations of TPR. Ensure cyber security measures are in place. Record planned and executed changes to systems. Written policy on maintaining, upgrading and replacing hardware which should be able to meet the current and anticipated system requirements. Manage planned and future admin software updates.
ADM0016	Cyber controls	NEW	Governing bodies should take steps to reduce the risk of cyber incidents occurring and appropriately manage any incidents that arise. Properly functioning cyber controls will assist in complying with data protection legislation. Scheme managers should establish and operate adequate internal

			<p>controls to reduce cyber risk. Ensure governing body has knowledge and understanding of cyber risk.</p> <p>Understand the need for confidentiality, integrity and availability of the systems and services processing personal data. Ensure cyber risk is listed in the risk register and reviewed regularly. Assess at intervals the vulnerability of the scheme's key functions, systems and assets and service providers to this risk. Consider specialist skills and expertise to understand and manage this risk. Ensure controls are in place .i.e anti-malware, anti-virus applications etc. Ensure systems and data are backed up regularly. Have policies in place for the use of devices for remote and home working. Maintain a cyber incident response plan.</p>
<u>Communications and disclosure</u>			
CAD001	General Principles for member communications	NEW	Guidelines as to how, when, what information is passed to members and

			in what format to meet legal obligations when communicating with members.
CAD005	Scams	NEW	As part of internal controls appropriate steps should be taken to mitigate the risk of scams. Due diligence should be carried out where appropriate for transfers and requests for early retirement. Governing bodies should ensure that members are made aware of such risks by providing clear information on how to stop a scam in all relevant comms to members and on scheme website etc. The PSIG code of good practice is a helpful tool to help protect members from scams.